

EXHIBIT E

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3

4 BLOCKCHAIN TECHNOLOGIES

5 CORPORATION,

6 Plaintiff /

7 Counterclaim Defendant, Case No.

8 against 1:18-cv-

9 RVH INC. and ROBERT HERSKOWITZ, 09352-AJN

10 Defendants /

11 Counterclaim Plaintiffs.

12

13 RVH INC. and ROBERT HERSKOWITZ,

14 Third-Party Plaintiffs,

15 against

16 NIKOLAOS SPANOS a/k/a NICK SPANOS

17 and THE SYNAPSE FOUNDATION d/b/a

18 ZAP.ORG,

19 Third-Party Defendants.

20

21 DEPOSITION OF NIKOLAOS SPANOS

22 DATE: Monday, March 9, 2020

23 TIME: 10:28 a.m.

24

25

	Page 2	Page 4
1 DATE:	Monday, March 9, 2020	
2 TIME:	10:28 a.m.	
3 LOCATION:	Foster Garvey PC	
4	100 Wall Street, 20th Floor	
5	New York, NY 10005-3708	
6 REPORTED BY:	Kenneth Katz, Notary Public	
7 JOB No.:	4019160	
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11		(Exhibits retained by counsel.)
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	Page 3	Page 5
1 APPEARANCES		
2 ON BEHALF OF DEFENDANTS:		
3 ALAN HELLER, ESQUIRE		
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10 ON BEHALF OF NIKOLAOS SPANOS:		
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13 1633 Broadway, 32nd Floor		
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16 (212) 660-3059		
17		
18		
19 ALSO PRESENT:		
20 Robert Herskowitz		
21		
22		
23		
24		
25		
1	N. SPANOS	
2	COURT REPORTER: Good morning. My name	
3	is Kenneth Katz; I am the reporter assigned by	
4	Veritext to take the record of this proceeding. I am	
5	a notary authorized to take acknowledgements and	
6	administer oaths in New York. We are now on the	
7	record.	
8	This is the deposition of Nikolaos	
9	Spanos taken in the matter of Blockchain Technologies	
10	Corporation, Plaintiff/Counterclaim Defendant against	
11	RVH Inc. and Robert Herskowitz,	
12	Defendants/Counterclaim Plaintiffs; RVH Inc. and	
13	Robert Herskowitz, Third-Party Plaintiffs against	
14	Nikolaos Spanos a/k/a Nick Spanos and The Synapse	
15	Foundation d/b/a ZAP.org, Third-Party Defendants at	
16	10:28 a.m. on Monday, March 9, 2020 at Foster Garvey	
17	PC, 100 Wall Street, 20th Floor, New York, New York	
18	10005.	
19	Absent an objection on the record	
20	before the witness is sworn, all parties and the	
21	witness understand and agree that any certified	
22	transcript produced from this recording of this	
23	proceeding:	
24	- is intended for all uses permitted	
25	under applicable procedural and	

2 (Pages 2 - 5)

<p>1 N. SPANOS 2 evidentiary rules and laws in the same 3 manner as a deposition recorded by 4 stenographic means; and 5 - shall constitute written stipulation 6 of such. 7 At this time will everyone in 8 attendance or appearing remotely please identify 9 yourself for the record, beginning from my right.</p> <p>10 THE WITNESS: Nikolaos Spanos. 11 MR. GINSBERG: Peter R. Ginsberg. 12 MR. HELLER: Alan Heller. 13 COURT REPORTER: Thank you. Hearing no 14 objection, I will now swear in the witness. 15 WHEREUPON,</p> <p>16 NIKOLAOS SPANOS, 17 called as a witness, and having been first duly sworn 18 to tell the truth, the whole truth and nothing but the 19 truth, was examined and testified as follows:</p> <p>20 COURT REPORTER: Please begin. 21 MR. HELLER: Okay. Let's go off the 22 record. Do you want Mr. Spanos -- 23 COURT REPORTER: Just one -- well, we 24 have -- 25 MR. HELLER: Off the record.</p>	<p>Page 6</p> <p>1 N. SPANOS 2 Please answer all questions with a verbal 3 response. The court -- well now it's not a 4 stenographer. Now it is a recording will not take a 5 nod or a grunt. It needs a verbal response. 6 And please, I have to assume that at various 7 times during the deposition, you will anticipate the 8 answer before I complete my question. But in order 9 for me to get the record straight, I'm going to ask 10 you to please, to the best of your ability, wait for 11 me to finish my question before you answer it. 12 And also I'm just -- I take this seriously. 13 And I know this may not be taken seriously. There are 14 certain things that are a little distracting. Please 15 try your best to take this seriously. And Mr. 16 Herskowitz just walked into this room. So we're just 17 about ready to start. Off the record. 18 COURT REPORTER: Okay. Just one 19 second. The time now is 10:32 a.m. 20 (Off the record.) 21 COURT REPORTER: We're back on the 22 record. The time now is 10:33 a.m. 23 BY MR. HELLER: 24 Q Okay. Mr. Spanos, are you familiar with an 25 entity by the name of Zap.org?</p>
<p>1 N. SPANOS 2 COURT REPORTER: Okay. We're going off 3 the record. The time now is 10:29 a.m. 4 (Off the record.) 5 COURT REPORTER: We're back on the 6 record. The time now is 10:30 a.m. 7 EXAMINATION 8 BY MR. HELLER: 9 Q Mr. Spanos, my name is Alan Heller. I'm 10 from the firm Foster Garvey. I represent the 11 defendants and the counterclaim plaintiffs and third- 12 party plaintiffs in this action. 13 I'm going to ask you a bunch of questions in 14 connection with the court order that was issued 15 permitting me to take the limited deposition of you in 16 connection with jurisdiction over Zap.org. And if you 17 do not understand the question, please tell me that 18 you do not understand. I do not want you to answer a 19 question that you don't understand. And then I'll try 20 to rephrase it. 21 If for any reason your attorney objects to 22 my question, please wait for him to state the 23 objection on the record and either I or your attorney 24 will let you know whether or not you should answer the 25 question that is posed.</p>	<p>Page 7</p> <p>1 N. SPANOS 2 A Entity? 3 Q Are you familiar with Zap.org? 4 A Yes. 5 Q What is Zap.org? 6 A It's a domain name. 7 Q Who owns Zap.org, the domain name? 8 A The foundation. 9 Q And what's the name of the foundation? 10 A Synapse Foundation. 11 Q When did the Synapse Foundation begin 12 ownership of Zap.org? 13 MR. GINSBERG: If you know. 14 THE WITNESS: I don't remember exactly. 15 I don't know. 16 BY MR. HELLER: 17 Q Approximately? Do you know how many years 18 ago? 19 A I don't remember. 20 Q Was it before or after -- are you familiar 21 with Mr. Herskowitz? 22 A Yeah. 23 Q Was it before or after you met Mr. 24 Herskowitz? 25 A After.</p>

3 (Pages 6 - 9)

<p style="text-align: right;">Page 10</p> <p>1 N. SPANOS 2 Q How long after you met Mr. Herskowitz did 3 you -- 4 A Oh, I don't know. I really don't. I don't 5 know. I don't remember exactly, you know, what year 6 it was because it was changes. I don't remember. I 7 don't remember. 8 Q Who were the owners of the Synapse 9 Foundation? 10 A I think don't think -- I don't think there 11 are owners. I think it's board members. 12 Q What is your role with Zap.org? 13 A I'm on the board. 14 Q Do you have any other relationship with 15 Zap.org? 16 A No. There's no -- I'm sorry. Can I go 17 back? 18 MR. GINSBERG: Sure. 19 THE WITNESS: I'm not on the board of 20 Zap.org. 21 BY MR. HELLER: 22 Q You're on the board of the Synapse 23 Foundation? 24 A Yes. 25 Q Who else is on the board of the Synapse</p>	<p style="text-align: right;">Page 12</p> <p>1 N. SPANOS 2 take credit for. 3 Q What would you take credit for? What did 4 you do that you think -- what do you think you did in 5 connection with Zap.org, whether or not you take 6 credit for it? 7 A I'd like to believe that I gave good 8 insight. 9 Q Has anyone ever objected to your placement 10 of the word cofounder of Zap.org on your LinkedIn 11 page? 12 A I don't run my LinkedIn page. So frankly I 13 didn't even know it was there. 14 Q Have you ever held yourself out as a 15 cofounder of Zap.org? 16 A Yeah. 17 Q Okay. Has anyone ever objected to your 18 holding yourself out as a cofounder of Zap.org? 19 A Do I have to answer that? There might have 20 been a few probably maybe. 21 Q Okay. Who objected to that? 22 A I don't remember. 23 Q Other than good insight, what else did you 24 do for Zap.org when it was founded? 25 A You know, like I was looked at as a good</p>
<p style="text-align: right;">Page 11</p> <p>1 N. SPANOS 2 Foundation? 3 A Iorgos Clufetos. There's a Danish guy. I 4 don't know his name. 5 Q You're currently -- 6 A I can't -- I don't know the name. 7 Q -- on the board, correct? 8 A Yeah. 9 Q Okay. At the time the Synapse Foundation 10 was founded, was organized, who was on the board of 11 the Synapse Foundation? 12 A I don't remember. 13 Q Was there a particular individual who came 14 up with the idea zap.org? 15 A I don't remember. 16 Q Did you play a role in the creation of 17 zap.org? 18 A I'd like to believe so. 19 Q Okay. Let the record reflect that your 20 LinkedIn webpage says that you're a founder of 21 zap.org. Is that correct? 22 A Well, cofounder maybe. 23 Q Okay. And as a cofounder of zap.org, what 24 did you do? 25 A With people -- I'm not sure what I could</p>	<p style="text-align: right;">Page 13</p> <p>1 N. SPANOS 2 resource. 3 Q By whom? 4 A By members of -- oh, I'm sorry. Is that 5 okay? Members of the board and, you know, people that 6 were involved. 7 Q Okay. Let's start with members of the board 8 and then people who were involved. At the time 9 Zap.org was formed, who were the members of the board 10 of Synapse Foundation? 11 A I don't remember. There were -- I don't 12 remember. 13 Q Okay. Is there anything that would -- 14 MR. GINSBERG: Do you remember anyone? 15 THE WITNESS: Huh? 16 MR. GINSBERG: Do you remember anyone? 17 THE WITNESS: I gave him names. I 18 don't remember. What's the question again? 19 BY MR. HELLER: 20 Q At the time of the formation of Zap.org, who 21 were the members of the board of the Synapse 22 Foundation? 23 A I gave you the names. I gave you Clufetos. 24 I don't remember the - 25 Q Are you able to spell the name?</p>

<p style="text-align: right;">Page 14</p> <p>1 N. SPANOS 2 A Not really. 3 Q How many members of the board were there? 4 A I don't remember. 5 Q Was it more than two? Because you said two, 6 you and this Clufetos. 7 A Yeah. Yeah. More than two. 8 Q Was there a third person? 9 A At least. 10 Q Okay. Have you ever had a board meeting of 11 the Synapse Foundation? 12 A Yeah. We had a -- yes. 13 Q Okay. Did you have a board meeting at the 14 time Zap.org was formed? 15 A No. 16 Q Since Zap -- 17 A Zap -- yeah. 18 Q Since Zap.org was formed -- at the time the 19 Synapse Foundation created Zap.org, did you have a 20 board meeting? 21 A Yeah, I think so. Yeah. 22 Q Okay. Were minutes taken of the board 23 meeting? 24 A I don't know. 25 Q Well, who took the minutes? Who was</p>	<p style="text-align: right;">Page 16</p> <p>1 N. SPANOS 2 MR. HELLER: -- there was a board 3 meeting on Synapse Foundation when Zap was formed. He 4 did say there was a board meeting. 5 MR. GINSBERG: I think your question 6 was after Zap.org was formed, not when it was formed. 7 I think the testimony was that when it was formed, 8 there wasn't. I may be wrong. But that was my 9 understanding of his testimony. 10 MR. HELLER: You may be wrong. But one 11 second. Please stop. 12 THE WITNESS: I'm sorry. I'm sorry. 13 BY MR. HELLER: 14 Q Was the Synapse Foundation formed at the 15 same time of the creation of Zap.org? 16 A No. 17 Q Was the Synapse Foundation formed after the 18 creation of Zap.org? 19 A No. 20 Q Okay. Other than Zap.org, does the Synapse 21 Foundation have any other assets? 22 A I don't know. 23 Q When you said you were a cofounder of the 24 Synapse Foundation -- or sorry. Strike that. You 25 said you're the cofounder of Zap.org. Who were the</p>
<p style="text-align: right;">Page 15</p> <p>1 N. SPANOS 2 responsible for taking minutes of the board meeting at 3 Zap.org for the Synapse Foundation? 4 A I don't know. There was -- I don't know. 5 Q Where were you when the board meeting took 6 place? 7 A I don't remember. I was -- 8 Q Were you in this country? 9 A I was on the phone. 10 Q It was on the phone. Were you on the phone 11 in New York? 12 A I don't remember that. I'd like to 13 remember. 14 Q Okay. After that, the board meeting, -- 15 A I was on the -- 16 Q -- that took place when Synapse formed 17 Zap.org -- 18 A I don't know if it was on the phone or on 19 the Google. 20 MR. GINSBERG: Objection. His 21 testimony was that wasn't the board meeting when 22 Zap.org was formed. 23 MR. HELLER: He said -- he said the -- 24 THE WITNESS: There was no Zap. I 25 wasn't on the --</p>	<p style="text-align: right;">Page 17</p> <p>1 N. SPANOS 2 other cofounders? 3 A I don't know. I don't remember because 4 whatever, because people just, you know, hype 5 themselves up. I don't know. I don't remember. 6 Q Okay. So I'm going to ask you about an 7 individual by the name of Ben Young. Is Ben Young a 8 cofounder of Zap.org? 9 A No. 10 Q In Nick Allen a cofounder of Zap.org? 11 A No. 12 Q Who are the people that hyped themselves up 13 as being cofounders of Zap.org? 14 MR. GINSBERG: Objection as to form. 15 THE WITNESS: I don't know. 16 BY MR. HELLER: 17 Q Well, you said other people hyped themselves 18 up. Who are those people? 19 A In general, people hyped themselves up and 20 give themselves titles as cofounder and all kinds of 21 stuff. 22 Q Okay. 23 A There's like a hundred Ethereum cofounders 24 and founders. So it's just -- I think it's a 25 practice. I don't know what it is.</p>

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<p style="text-align: right;">Page 18</p> <p>1 N. SPANOS 2 Q Okay. So who do you recognize as a 3 cofounder of Zap.org other than you? 4 A I don't know what it means, cofounder. 5 Q You mentioned previously during testimony 6 that you believed you were a cofounder of Zap.org. So 7 what in your mind -- 8 A Yeah. I mean, it's a feeling. 9 Q Let me finish the question. 10 A Yeah. I'm sorry. 11 Q What in your mind do you understand a 12 cofounder to be? 13 A That's a good question. Is that to form? 14 MR. GINSBERG: That's okay. 15 THE WITNESS: It's fine. I never did 16 this before. I think I saw it in a movie. Someone 17 that was around in the beginning. 18 BY MR. HELLER: 19 Q And you used the term cofounder. So were 20 there other people who were around in the beginning? 21 A Yeah. 22 Q Who? 23 A I don't want to screw this up. I don't know 24 who's self-identifying as cofounder. And -- 25 Q I'm not asking who's self-identifies.</p>	<p style="text-align: right;">Page 20</p> <p>1 N. SPANOS 2 you? 3 MR. GINSBERG: In the what? I didn't 4 understand your question. 5 BY MR. HELLER: 6 Q My question was who was around in the 7 beginning of Zap.org other than Mr. Spanos. 8 A There's a guy who has a company in Poland. 9 I don't really remember his name. It's a weird name. 10 There's a Danish guy who I don't really remember. And 11 even if I had his name in front of me, I couldn't read 12 it because it's just weird. And I don't know. 13 Q Was Ben Young around in the beginning? 14 A Ben Young was around. But there were, you 15 know, a bunch of people. Community members. So was 16 he a community member? You know, the nature of this 17 is looser than let's say like this law firm or a 18 company. It's much looser, these decentralized 19 characters. You know what I mean? 20 Q Not really. Please explain. 21 A It's just looser. It's just looser. 22 There's no organizational chart or maybe there is 23 another. Just that was a loose thing. 24 Q Have you ever looked at the Zap.org website? 25 A Yeah. I don't like it.</p>
<p style="text-align: right;">Page 19</p> <p>1 N. SPANOS 2 MR. GINSBERG: Let him finish please, 3 Mr. Heller. 4 THE WITNESS: I'm just saying the 5 reason why I'm hesitating the answer is hesitant in 6 being confident in an answer. You want a confident 7 answer, right? 8 So the reason why I'm hesitating is 9 that I'm not sure who's self-identifying as a 10 cofounder. And I don't really have cofounder as a 11 definition in my brain. I really don't understand the 12 nomenclature. 13 BY MR. HELLER: 14 Q In your brain -- 15 A Yeah. 16 Q -- you said cofounder is someone who was 17 around in the beginning. 18 A Yeah. 19 Q Who was around in the beginning other than 20 you? 21 A So they could have been around in the 22 beginning and then they could have left in the 23 beginning. Or they could have like -- you know what I 24 mean? I don't know. 25 Q Who was around in the beginning other than</p>	<p style="text-align: right;">Page 21</p> <p>1 N. SPANOS 2 MR. HELLER: Let's mark this. 3 COURT REPORTER: How do you want to 4 mark it? 5 MR. HELLER: Call it defendant's A. 6 Or, you know, Spanos A. 7 (Exhibit Spanos A was marked for 8 identification.) 9 THE WITNESS: You got any Lysol? I've 10 got to look at that? I don't have a spleen. 11 MR. HELLER: Sorry to hear that. 12 THE WITNESS: I've had pneumothorax. 13 It took a lot to get me out here, mentally to leave 14 the house. 15 BY MR. HELLER: 16 Q Mr. Spanos, what I've placed before you is a 17 document that's been marked as Spanos A for 18 identification. 19 A Yes. 20 Q And it's an eight-page document marked RVH - 21 - Bates-stamped RVH_000290000297. And it appears to 22 be a printout from the Zap.org website. Have you ever 23 seen this before? 24 A No, I've never seen this. 25 Q Okay. So I'll ask you to turn to page 293.</p>

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<p style="text-align: right;">Page 22</p> <p>1 N. SPANOS 2 A 293? 3 Q Yeah. You see in the bottom it says -- 4 A Yeah. But it's two of eight. 5 Q Okay. Turn to four of eight. How's that? 6 That's a little bit different. 7 A No. I'm just sorry. I can't see that well. 8 I've had a lot of eye surgeries where people -- 9 MR. GINSBERG: Try not to talk over -- 10 THE WITNESS: Oh, I got it. Sorry. 11 MR. GINSBERG: Let him finish his 12 sentence. 13 THE WITNESS: Okay. Oh, wow. Nice. 14 BY MR. HELLER: 15 Q So it mentions "Our Team", the Zap team. 16 And it has the advisory board. 17 A Yeah. Yeah. Yeah. 18 Q And it mentions Sean Combs, Kumail Akbari, 19 Andy Goldstein, Jonathan Heyman, Dwayne Campbell, 20 Danny Zaterman, Evan Renov and Matt Hollander. Do you 21 recognize any of those individuals? 22 A Yes. 23 Q And are each of those individuals members of 24 the advisory board of the Zap.org? 25 A No.</p>	<p style="text-align: right;">Page 24</p> <p>1 N. SPANOS 2 We don't have to replay it. 3 COURT REPORTER: All right. 4 BY MR. HELLER: 5 Q Who is not on the advisory board of Zap.org 6 from the list of eight people that I just read to you? 7 A All of them. 8 Q Were any of them ever on the advisory board 9 of Zap.org? 10 A No. 11 Q Turn to the next page where it says "The Zap 12 Team." And it lists 12 individuals on the Zap team. 13 You know, I'm going to go back to the prior with the 14 Zap -- the advisory board. 15 Were any of the individuals listed, the 16 eight individuals, on the advisory board of the 17 Synapse Foundation? 18 A Yes. 19 Q Which of the eight individuals were on the 20 advisory board of the Synapse Foundation? 21 A The guy from Jamaica. 22 Q Who's the guy from Jamaica? 23 A Dwayne. 24 MR. GINSBERG: Who did you say? I'm 25 sorry.</p>
<p style="text-align: right;">Page 23</p> <p>1 N. SPANOS 2 Q Okay. Who's not a member of the advisory 3 board? 4 A Where did this come from? 5 Q The Zap.org website. 6 A I don't think so. 7 Q I'm focusing on the page before the page 8 you're turning to. I'm only focusing on the advisory 9 board. 10 MR. GINSBERG: Mr. Spanos has a right 11 to look at the entire document, Mr. Heller. 12 MR. HELLER: Fine. No problem. 13 THE WITNESS: No. I mean, I never -- 14 say that question again. 15 MR. HELLER: Can you play back the 16 question, please? 17 MR. GINSBERG: It's going to be a lot 18 faster if you can repeat it. 19 MR. HELLER: I don't think I can 20 remember what the question was. 21 THE WITNESS: Who's not -- 22 MR. HELLER: Okay. Okay. So who's 23 not. 24 COURT REPORTER: I'm -- okay. Hold on. 25 MR. HELLER: It's fine. Let's go back.</p>	<p style="text-align: right;">Page 25</p> <p>1 N. SPANOS 2 THE WITNESS: Hmm? 3 MR. GINSBERG: Who'd you say? Okay. 4 THE WITNESS: I'm having a hard time 5 remembering. But Dwayne, maybe Hollander, maybe. And 6 this is not on the Zap.org site, just FYI. 7 BY MR. HELLER: 8 Q Not currently. 9 A Yeah. 10 Q Not currently. It was taken off after it 11 was printed out. 12 A So you're saying -- 13 MR. GINSBERG: Wait, wait. Are you 14 making a representation? 15 MR. HELLER: Yes. I printed it out off 16 of the Zap.org website. 17 THE WITNESS: So this was on there? 18 MR. HELLER: Oh, yes. 19 BY MR. HELLER: 20 Q Was Sean Combs at any point in time ever 21 affiliated or working with the Synapse Foundation? 22 A You know what, I don't remember. I don't 23 remember what category, what you can call him, title. 24 MR. GINSBERG: That wasn't the 25 question.</p>

<p style="text-align: right;">Page 26</p> <p>1 N. SPANOS 2 THE WITNESS: Oh, what was the 3 question? 4 BY MR. HELLER: 5 Q Was he at any time -- 6 A Oh. 7 Q -- affiliated? 8 A Yeah. 9 Q Okay. What was his role? 10 A That's the answer I gave before. I don't 11 recall his exact description of his role. 12 Q Do you recall anything about his role? 13 A You know, I don't have the paperwork in 14 front of me to answer -- 15 Q Oh, so there's paperwork? 16 MR. GINSBERG: Excuse me. Please don't 17 interrupt him. 18 MR. HELLER: I'm sorry. 19 THE WITNESS: Don't interrupt. 20 BY MR. HELLER: 21 Q Go. Tell me about the paperwork. 22 A Well, I remember that there was some paper. 23 Q Where? 24 A So I don't know where they are. 25 Q Oh.</p>	<p style="text-align: right;">Page 28</p> <p>1 N. SPANOS 2 THE WITNESS: I'm trying to answer. 3 MR. GINSBERG: Excuse me. Now you're 4 interrupting me. 5 MR. HELLER: Well, don't say I'm making 6 faces when I'm not making faces. Don't say that. 7 That's not true. 8 MR. GINSBERG: Mr. Heller, don't tell 9 me what to do. I'm making an objection. 10 MR. HELLER: Make the objection. 11 MR. GINSBERG: If you don't like it, 12 then you can make a record. But you are making faces. 13 You're shrugging your shoulders. You're interrupting 14 Mr. Spanos. And I ask you respectfully not to do 15 that. 16 MR. HELLER: I take your request under 17 advisement. And I will respect Mr. Spanos. But I do 18 object to the fact that you're saying I'm making 19 faces. I am not. 20 BY MR. HELLER: 21 Q Please answer the question. 22 A I'm trying. I think -- I think it was a fax 23 or, you know, I don't know what it was. But there was 24 a piece of paper like one -- oh, you know what it was? 25 There was a phone conversation and what, you know,</p>
<p style="text-align: right;">Page 27</p> <p>1 N. SPANOS 2 A But I would love to be able to read them to 3 know what the heck, you know, the job description was. 4 Q Okay. And who entered into that paperwork 5 with Sean Combs? 6 MR. GINSBERG: Objection. There was no 7 testimony someone entered into paperwork with Mr. 8 Combs. 9 BY MR. HELLER: 10 Q Please describe the paperwork. 11 A I don't remember. But it was paper I think. 12 Q You're talking about paper that you wished 13 you would have in front of you so it could refresh 14 your recollection as to what Sean "Puffy" Combs did 15 for the Synapse Foundation. What type of paperwork 16 were you thinking of? 17 A I don't remember. But it was -- I'm trying 18 to answer. 19 Q I hope so. 20 A I am. I'm trying to answer. 21 MR. GINSBERG: Mr. Heller, you're 22 making faces at Mr. Spanos. You're interrupting. 23 You're -- 24 MR. HELLER: I'm not making any faces. 25 I totally, totally object to that.</p>	<p style="text-align: right;">Page 29</p> <p>1 N. SPANOS 2 people wanted from him. 3 Q Did you participate in that phone 4 conversation? 5 A Yeah. 6 Q Who -- 7 A Well, they wanted -- you know, this was 8 noise. You know, if someone -- I'm pretty popular in 9 this industry. And, you know, I found myself put on 10 websites as founder on the things I never heard of. 11 As a matter of fact, I picked up some -- I 12 was in a cab. I jumped in a cab and someone jumped in 13 the cab at the same time. I should have figured -- 14 and I said, well, where are you going. A Chinese guy. 15 He goes I'm going to the East Village. And I said, 16 oh, I'll take you there. I'll drop you off, because I 17 felt bad. 18 And the guy said he was interested in 19 blockchain to me because he knew who I was apparently. 20 And then he went and he put my name on his site as a 21 founder or, I don't know. I don't know if it was a 22 founder. But he put his name on my site. 23 MR. GINSBERG: Your name on his site. 24 THE WITNESS: Yeah. And I had nothing 25 to do with that guy. Does Mr. Herskowitz want some of</p>

8 (Pages 26 - 29)

<p style="text-align: right;">Page 30</p> <p>1 N. SPANOS 2 him? Because he can have all he wants. You know what 3 I mean? I mean, there's other -- 4 MR. GINSBERG: There's no question 5 pending. 6 THE WITNESS: All right. All right. 7 I'm just saying that people -- 8 MR. HELLER: Peter? Please. I don't 9 like those digs. If he's going to do a dig, then it's 10 going to get very nasty. 11 MR. GINSBERG: Let's continue. 12 THE WITNESS: I didn't do a dig. What 13 is a dig? 14 MR. GINSBERG: Let's continue the 15 deposition, please. 16 THE WITNESS: I didn't do a dig. I'm 17 not as smart as you guys. 18 MR. GINSBERG: Is there a question 19 pending? 20 MR. HELLER: No. 21 MR. GINSBERG: If there are no more 22 questions, we can leave. If there are questions, 23 let's proceed. 24 MR. HELLER: There are a lot of 25 questions.</p>	<p style="text-align: right;">Page 32</p> <p>1 N. SPANOS 2 people from the Synapse Foundation, how do you 3 communicate? 4 A Over like, I don't know, some kind of 5 audible because I'm not -- my eyeballs aren't that 6 good, so. I've had many surgeries in my eyes, and not 7 LASIK because I have -- so I don't really use email 8 that much. You can attest to that, right? I don't 9 read my email. 10 Q Have you ever communicated electronically 11 with anyone in connection with -- 12 A Over the telephone. 13 Q Have you -- could you please let me finish 14 my question? 15 A I'm sorry. 16 MR. GINSBERG: Let him ask a question. 17 THE WITNESS: I'm sorry. 18 BY MR. HELLER: 19 Q Have you ever communicated electronically 20 with anybody from the Synapse Foundation? 21 A Yes. Over the phone. Over apps. Audible. 22 Q Okay. Are those -- 23 A Like WhatsApp or something like that. I 24 don't know if it was -- 25 Q And are those apps transcribed --</p>
<p style="text-align: right;">Page 31</p> <p>1 N. SPANOS 2 MR. GINSBERG: Okay. Then let's 3 proceed. 4 BY MR. HELLER: 5 Q Where does Zap.org keep its paperwork? 6 A It's pretty much a paperless world right 7 now. When I said there was a piece of paper or there 8 was paperwork, you know, I don't know if it was filed 9 or anything like that. Is that what you're asking me? 10 MR. GINSBERG: No. He just wants to 11 know -- 12 THE WITNESS: I don't know. I don't 13 know. Either Isle of Man or Switzerland. I don't 14 know. 15 BY MR. HELLER: 16 Q How do you communicate with individuals in 17 the Synapse Foundation? 18 A It's been a -- 19 MR. GINSBERG: Objection. Assumes 20 facts not in evidence. 21 BY MR. HELLER: 22 Q Do you communicate with people from the 23 Synapse Foundation? 24 A I can answer? Very sporadically. 25 Q When you sporadically communicate with</p>	<p style="text-align: right;">Page 33</p> <p>1 N. SPANOS 2 A Something else. 3 Q And are those apps transcribed into writing? 4 A No. Should they? 5 MR. GINSBERG: No. Come on. Just 6 answer his questions. 7 THE WITNESS: Well, I'm saying I don't 8 know. 9 MR. GINSBERG: You're not asking 10 questions. He is. 11 THE WITNESS: Oh, he's asking 12 questions. Don't get mad at me. I don't want you to 13 get mad at me. 14 BY MR. HELLER: 15 Q Do you ever use Twitter? 16 A Well, I have people that use Twitter for me. 17 Q Who? 18 A I don't know. Different people over time. 19 Q Who? 20 A That's a good question. From the beginning 21 of Twitter, of my use on Twitter? 22 Q From the beginning of your use on Twitter. 23 Yes. 24 A I don't know. Whatever. People say to me, 25 hey, you know, send this out because x, y, z. Send</p>

<p style="text-align: right;">Page 34</p> <p>1 N. SPANOS 2 this out because apparently I have a bullhorn to the 3 community. So people ask me to tweet things like what 4 the hell is his name, like John Mathews I think asked 5 me to -- from Global Arena Holdings, asked me to tweet 6 things out.</p> <p>7 Q Other than Mr. Mathews, who asked you to 8 tweet things out?</p> <p>9 A Or I think he told me to stop tweeting 10 things out. I don't remember. I think he told me -- 11 I don't know. I don't know. It's a promotional tool 12 that people want, as a matter of fact, to pay me to 13 do.</p> <p>14 Q Do you ever tweet things out?</p> <p>15 A Once in a while.</p> <p>16 Q Okay. And do you do it yourself?</p> <p>17 A Whoever's next to me. I make sure that they 18 -- I don't know.</p> <p>19 Q So when do --</p> <p>20 A Like right now if I was going to tweet 21 something, I'd say, oh, I want to tweet. What does 22 this look like? Is that what it -- you know what I 23 mean?</p> <p>24 MR. HELLER: Off the record, please. 25 COURT REPORTER: Going of the record.</p>	<p style="text-align: right;">Page 36</p> <p>1 N. SPANOS 2 A No. 3 Q Has Kumail Akbari done any work or performed 4 any services on behalf of the Synapse Foundation?</p> <p>5 A I'm not -- I can't answer that positive or 6 negative. I don't know a hundred percent.</p> <p>7 Q Do you know for certain that he has not done 8 -- performed any services for the Synapse Foundation?</p> <p>9 MR. GINSBERG: You can't write 10 something because --</p> <p>11 MR. HELLER: There's a question 12 pending.</p> <p>13 THE WITNESS: Oh, I can't? 14 MR. GINSBERG: No. 15 THE WITNESS: I want to ask you -- 16 MR. HELLER: There's a question 17 pending.</p> <p>18 THE WITNESS: -- how to answer. 19 MR. GINSBERG: There's a question 20 pending.</p> <p>21 THE WITNESS: Oh, I can't? 22 MR. GINSBERG: Not while there's a 23 question pending.</p> <p>24 THE WITNESS: Wow. All right. Say 25 that again. I didn't hear. I don't remember what you</p>
<p style="text-align: right;">Page 35</p> <p>1 N. SPANOS 2 The time now is --</p> <p>3 THE WITNESS: Should I go to the 4 bathroom?</p> <p>5 COURT REPORTER: -- 11:08 a.m. 6 (Off the record.)</p> <p>7 COURT REPORTER: Back on the record. 8 The time now is 11:19 a.m.</p> <p>9 MR. HELLER: Okay. Peter, for the 10 record, unless you object, whenever I refer to 11 Zap.org, I am referring to the Synapse Foundation as 12 well. I'm referring to them as the same --</p> <p>13 MR. GINSBERG: I think you have to 14 separate them out.</p> <p>15 MR. HELLER: So I'll separate them out 16 into two questions for each one.</p> <p>17 BY MR. HELLER:</p> <p>18 Q Who is Kumail Akbari?</p> <p>19 A A friend of mine that I've known for a long 20 time.</p> <p>21 Q Is Kumail Akbari in any way associated with 22 the Synapse Foundation?</p> <p>23 A No.</p> <p>24 Q Is Kumail Akbari in any way affiliated with 25 Zap.org?</p>	<p style="text-align: right;">Page 37</p> <p>1 N. SPANOS 2 said.</p> <p>3 BY MR. HELLER:</p> <p>4 Q Are you able to say for certain that Kumail 5 Akbari has performed no services for the Synapse 6 Foundation?</p> <p>7 A No. Can I do it now? Can I write something 8 now?</p> <p>9 MR. GINSBERG: Yeah. Now there's no 10 question pending.</p> <p>11 THE WITNESS: Okay. Hold on a second. 12 I want to ask him a question properly.</p> <p>13 MR. HELLER: All right. Let the record 14 reflect that the witness is writing a note to his 15 attorney.</p> <p>16 MR. GINSBERG: Okay.</p> <p>17 THE WITNESS: All I'm saying --</p> <p>18 MR. GINSBERG: -- a question you can 19 answer.</p> <p>20 BY MR. HELLER:</p> <p>21 Q Has Kumail Akbari provided any services on 22 behalf of Zap.org?</p> <p>23 MR. GINSBERG: You can -- you can tell 24 him that. Go ahead.</p> <p>25 THE WITNESS: All right. That was my</p>

<p style="text-align: right;">Page 38</p> <p>1 N. SPANOS 2 thing. So services, what do you mean by services? 3 BY MR. HELLER: 4 Q Has he performed any work, has he been 5 affiliated with, has he helped? What has he done, if 6 anything, for Zap.org? 7 MR. GINSBERG: Are you talking about 8 either compensated or uncompensated? 9 MR. HELLER: Yes. 10 THE WITNESS: So yeah, uncompensated. 11 He's probably helped out. Yeah. I didn't understand 12 if it was -- what the question was when you said work, 13 whatever. Work. 14 BY MR. HELLER: 15 Q What type of uncompensated services -- 16 A Yeah. Volunteer. 17 Q -- has Mr. Akbari and when did he volunteer? 18 A I don't know. He's -- I don't want to put 19 this on the record about him. But he's not really a 20 hundred percent person. 21 Q Where does Kumail Akbari live? 22 A I don't know. 23 Q Does he live in New York? 24 A I don't know. 25 Q Does he live in -- does he work in New York?</p>	<p style="text-align: right;">Page 40</p> <p>1 N. SPANOS 2 (Off the record.) 3 COURT REPORTER: We're back on the 4 record. The time now is 11:26 a.m. 5 BY MR. HELLER: 6 Q Was Mr. Akbari ever affiliated with the 7 Bitcoin Center of New York City? 8 A He came around, as did many other people. 9 Hundreds of people came around. 10 Q Other than coming around, did he perform any 11 compensated or uncompensated services for the Bitcoin 12 Center of New York City? 13 A I don't think so. 14 Q Who is Andy Goldstein? 15 MR. GINSBERG: I'm sorry? What's the 16 name? 17 BY MR. HELLER: 18 Q Andy Goldstein. 19 A He's -- I don't know what you mean by that. 20 He's a human. He's in the industry. 21 Q Okay. 22 A I don't know what you mean by who he is. 23 Q Was Andy Goldstein ever part of the advisory 24 board of the Synapse Foundation? 25 A He had given advice. I'm not sure if that</p>
<p style="text-align: right;">Page 39</p> <p>1 N. SPANOS 2 MR. GINSBERG: Objection. Assumes 3 facts not in evidence. 4 BY MR. HELLER: 5 Q Where does Mr. Akbari work? 6 MR. GINSBERG: Same objection. Assumes 7 facts not in evidence. 8 BY MR. HELLER: 9 Q You testified previously that Mr. Akbari is 10 a good friend. 11 A Yeah. He's lived in many places. 12 Q Okay. 13 A I'm not sure where he lives right now. 14 Q Has he ever lived in New York? 15 A I'm not sure. 16 Q Did Mr. Akbari ever -- was he ever 17 affiliated with the Bitcoin -- 18 THE WITNESS: Can we go off the record 19 a second? 20 MR. HELLER: Go off the record. 21 THE WITNESS: I want to go off the 22 record because I want to say something about Kumail 23 that I don't want to be on the record. 24 COURT REPORTER: Okay. We're going 25 off the record. The time now is 11:25 a.m.</p>	<p style="text-align: right;">Page 41</p> <p>1 N. SPANOS 2 constitutes -- you're going by this piece of paper 3 here. And this piece of paper, you know, if it's a 4 representation of the website, I'm not sure, you know. 5 So he gave advice. So yeah, I don't know. You want 6 to call -- he was an advisor. 7 Q So are you saying -- let's strike that. Is 8 this piece of paper that's in front of you that's 9 marked as Spanos A, and in particular page four of 10 eight, is it inaccurate in any way? 11 A No. I'm just -- I'm not sure because I'm 12 not familiar with it. 13 Q Okay. 14 A So I'm not sure if it's inaccurate. I'm not 15 sure at which moment. I know that a default was if 16 nobody -- if people that were working on the website 17 didn't know the -- didn't know like where the person 18 came from or whatever, they would put as a default 19 Bitcoin Center because everyone went to the Bitcoin 20 Center. 21 It's not a representation of if someone 22 worked at the Bitcoin Center. I didn't agree to that. 23 But that's what happened. 24 Q Who prepared the website for the Synapse 25 Foundation?</p>

11 (Pages 38 - 41)

<p style="text-align: right;">Page 42</p> <p>1 N. SPANOS 2 A There were many, many people, some in the 3 Armenia, some in Belarus. 4 Q And who had -- 5 A To the best of my knowledge, there was 6 probably more, I don't know. 7 Q Who from the Synapse Foundation communicated 8 with the individuals who prepared the website for 9 Zap.org? 10 A It was probably conference -- a conference 11 call, a bunch of people. 12 Q Were you on the conference call? 13 A Some. But not all the time. 14 Q And during those conference calls that you 15 were participating in with the website people, who 16 else participated in the conference calls? 17 A You know, the -- oh, excuse me. Which 18 conference call? For this -- to build this site? 19 Q For the website. 20 A A bunch of Belarusians, a bunch of 21 Armenians. 22 Q How many Belarusians? 23 A I don't know. 24 Q How many Armenians? 25 A Three or less of each.</p>	<p style="text-align: right;">Page 44</p> <p>1 N. SPANOS 2 trying to give you my memory of it, not just -- like 3 one time I saw that everyone was on here as from the 4 Bitcoin Center. And I called up the Belarusians. Oh, 5 there was Polacks too. There's Polish too. 6 BY MR. HELLER: 7 Q All right. So can you -- 8 A I said why is everyone on there from the 9 Bitcoin Center. That guy never even went to the 10 Bitcoin Center. Why does it say that he's from the 11 Bitcoin Center? He goes, oh, that's the default. 12 MR. GINSBERG: But the question, Nick, 13 is when you participated in those calls -- 14 THE WITNESS: That was -- 15 MR. GINSBERG: -- who directed you to 16 participate in the calls? 17 THE WITNESS: Well, it depends. You 18 know, yeah. So someone. I don't know. Someone or 19 someone from -- either Iorgos or a Belarusian or an 20 Armenian or a Dane. 21 BY MR. HELLER: 22 Q Where were you when you participated in the 23 conference calls? 24 A I'm not sure. I don't remember. 25 Q Do you recall how --</p>
<p style="text-align: right;">Page 43</p> <p>1 N. SPANOS 2 Q And who -- 3 A Not at the same time. I don't think the 4 Belarusians. I'm not sure. 5 Q Who from the Synapse Foundation participated 6 in this conference call? 7 A Well, I would participate, you know, when I 8 was told. But -- 9 Q And who would have told you to participate? 10 MR. GINSBERG: I'm not sure he was done 11 with his answer. Were you done with your answer? 12 THE WITNESS: I think so. 13 BY MR. HELLER: 14 Q Who would have told you to participate? 15 A I'm trying to think of the times that it 16 occurred so I can give you the right answer. 17 Q How many times did these -- 18 MR. GINSBERG: Well wait -- 19 MR. HELLER: Okay. 20 THE WITNESS: A bunch. 21 MR. GINSBERG: I mean, he's trying to 22 answer the question. 23 MR. HELLER: I -- 24 THE WITNESS: I'm just trying to 25 remember. I'm trying to remember. I'm actually</p>	<p style="text-align: right;">Page 45</p> <p>1 N. SPANOS 2 A Where were you when you -- I don't know 3 that. It doesn't -- 4 Q How many calls do you remember? 5 A Like I remember when the space shuttle blew 6 up -- 7 Q How many calls -- 8 A -- where I was. But I don't remember where 9 I am when, you know, someone's giving me a phone call. 10 Q How many calls did you participate in 11 regarding the website? 12 A I don't remember. But probably a bunch. 13 Q You've mentioned a call when you discussed - 14 - when you referenced the Bitcoin Center. 15 A Yeah. 16 Q Do you recall when that call took place? 17 A A few years ago. I don't remember the exact 18 day. 19 Q Do you remember who you were speaking to at 20 the time? 21 A Hold on. I think it was a Polish guy named 22 Roman. 23 Q Do you recall anyone else who was on the 24 call at that time? 25 A The Danish guy. I don't know.</p>

12 (Pages 42 - 45)

<p style="text-align: right;">Page 46</p> <p>1 N. SPANOS 2 Q Did Ben Young ever -- 3 A It was a bunch of people, a bunch of people. 4 Q Did Ben Young have any prior affiliation to 5 the Bitcoin Center? 6 A Ben Young did. 7 Q Did Steve Geros, G-E-R-O-S, have any prior 8 affiliation -- 9 A You know, I don't remember -- 10 Q -- to the Bitcoin Center? 11 MR. GINSBERG: Let him finish his 12 question. 13 THE WITNESS: Oh, I'm sorry. 14 BY MR. HELLER: 15 Q Did Steve Geros have any prior affiliation 16 with the Bitcoin Center? 17 A So affiliation, again, my question is what's 18 the definition of affiliation, meaning paid or unpaid 19 -- 20 Q Paid. 21 A -- or a visitor? 22 Q Paid or unpaid. 23 A Or a visitor? Because it was a public space 24 for any -- you know, the doors were open to anyone to 25 walk in. Even Mr. Herskowitz walked in.</p>	<p style="text-align: right;">Page 48</p> <p>1 N. SPANOS 2 don't remember. 3 Q Did Eric Dixon perform any services, paid or 4 unpaid services -- 5 A I think he performed -- 6 MR. GINSBERG: Let him finish. He 7 hasn't -- 8 THE WITNESS: Oh, I'm sorry. 9 MR. GINSBERG: -- finished the 10 question. 11 THE WITNESS: Okay. I'm sorry. 12 BY MR. HELLER: 13 Q Did Eric Dixon perform any paid or unpaid 14 services for Blockchain Technologies? 15 A I don't remember. But I think he worked. 16 Yeah. I don't remember. You mean paid or unpaid? 17 Yeah. 18 Q Did Ben Dixon perform any paid or unpaid 19 services for the Synapse Foundation? 20 A No. 21 MR. GINSBERG: Object. Ben Dixon? 22 BY MR. HELLER: 23 Q Sorry. Did Eric Dixon, thank you, perform 24 any paid or unpaid services for the Synapse 25 Foundation?</p>
<p style="text-align: right;">Page 47</p> <p>1 N. SPANOS 2 Q Not only someone who just walked in. Did he 3 have any role -- 4 A He walked in over and over and over. 5 Q -- in connection -- 6 MR. GINSBERG: Let him finish the 7 question so the record's clear. And the question 8 really isn't particularly clear. So maybe you could 9 define what you mean by affiliated. 10 BY MR. HELLER: 11 Q Did Steve Geros hold any titles with the 12 Bitcoin Center? 13 A I don't remember. 14 Q Did Steve Geros receive any compensation 15 from the Bitcoin center? 16 A I don't remember. No. 17 Q Did he receive any compensation from 18 Blockchain Technologies? 19 A I don't remember. He might have. 20 Q Did Ben Young receive compensation from 21 Blockchain Technologies? 22 A I think so. I think so. 23 Q Did Eric Dixon receive any compensation from 24 Blockchain Technologies? 25 A You know, I don't know. I don't know. I</p>	<p style="text-align: right;">Page 49</p> <p>1 N. SPANOS 2 A I don't think so. Did he perform any paid 3 or unpaid services? Well, that would be what your 4 definition of the word services is. 5 Q Did Eric Dixon do anything whatsoever in 6 this world on behalf of the Synapse Foundation? 7 A On behalf of the Synapse Foundation? 8 Q Yes. 9 A I don't know. I don't remember. 10 Q Where does Eric Dixon reside? 11 A Because I -- excuse me? 12 Q Where does Eric Dixon reside? 13 A Resolve? 14 Q Reside. 15 A In New Jersey. 16 Q Where does Eric Dixon work? 17 A I don't know. I don't remember. I know he 18 had an office somewhere where they had the bombing 19 with the pressure cookers. It was right outside his 20 office or something. I don't know where though. 21 Q In Manhattan? 22 A In Manhattan. But I don't know if he's 23 still there. I don't know. I don't know. 24 Q Did Ben Young -- 25 A I don't know anymore.</p>

13 (Pages 46 - 49)

<p style="text-align: right;">Page 50</p> <p>1 N. SPANOS 2 Q -- perform any services, anything in the 3 world, any work on behalf of the Synapse Foundation, 4 paid or unpaid? 5 A I'm not sure. 6 Q As you sit here today, can you say that he 7 did not do anything on behalf of the Synapse 8 Foundation? 9 A Well, I'm not sure. I mean, Ben Young under 10 contract of another company, you know. I don't know. 11 Q Did Ben Young or any entity with whom he is 12 affiliated -- 13 A Probably. Let him finish the question. 14 MR. GINSBERG: Let him finish the 15 question. 16 THE WITNESS: I'm sorry. I'm sorry. 17 I'm trying to be helpful. I am, you know? 18 BY MR. HELLER: 19 Q -- perform -- perform any services, paid or 20 unpaid on behalf of the Synapse Foundation? 21 A Listen, I did a Simon Says with 12,000 22 people two years in a row and won both times. So 23 you've got to ask very clearly. I'll give you a clear 24 answer. So services, what does that mean? I don't 25 understand.</p>	<p style="text-align: right;">Page 52</p> <p>1 N. SPANOS 2 MR. HELLER: That is true. 3 MR. GINSBERG: Excuse me. The record 4 reflects that when Mr. Spanos, after trying to 5 understand these very broad questions with undefined 6 terms, gives you an answer, you don't follow up and 7 you're not asking for any specifics. I'm not really 8 quite sure exactly what you're doing. 9 But it seems to me if you think any of 10 these questions relate to jurisdiction, that thought 11 is misguided. And I'm not really sure what we're 12 doing with these questions. So perhaps if you could 13 define your terms and make them more specific, we 14 could move along. 15 MR. HELLER: Perhaps if your client 16 will answer the questions, we can move along. Let's 17 go. 18 MR. GINSBERG: He's trying to answer -- 19 MR. HELLER: No. He's not. 20 MR. GINSBERG: -- very difficult 21 amorphous, opaque questions. 22 MR. HELLER: I totally disagree with 23 you. But you can have your opinion and I can have 24 mine. 25 BY MR. HELLER:</p>
<p style="text-align: right;">Page 51</p> <p>1 N. SPANOS 2 Q Okay. Anything in the world on behalf of 3 the Synapse Foundation. Did he do anything? 4 A Yes. 5 MR. GINSBERG: You know, wait a minute. 6 Objection. I don't know what on behalf of means 7 either. If you -- 8 THE WITNESS: Yeah. 9 MR. GINSBERG: If you -- these 10 questions really don't go I think to the substance and 11 you're not asking geographically where it occurred, 12 what it occurred. 13 MR. HELLER: Then you will -- 14 MR. GINSBERG: You're asking some very 15 general questions with terms that aren't defined. 16 MR. HELLER: Then you'll object as to 17 foundation if I don't ask first whether he did 18 something. Then I have to ask where he did it. So if 19 I get an answer whether or not he did, then I will ask 20 where he did it. 21 MR. GINSBERG: But you're not. 22 MR. HELLER: But I'm not even getting 23 an answer when and where or what he did. 24 MR. GINSBERG: That's not correct. The 25 record --</p>	<p style="text-align: right;">Page 53</p> <p>1 N. SPANOS 2 Q Let's start from scratch. Who is Ben Young? 3 Strike that. How are you familiar with Ben Young? 4 A He walked into the Bitcoin Center years ago 5 on 40 Wall. 6 Q And after he walked into the Bitcoin Center 7 at 40 Wall, did you individually or on behalf of any 8 entity have any business relationships with Ben Young? 9 MR. GINSBERG: On that day? 10 BY MR. HELLER: 11 Q After. He walked into the Bitcoin Center. 12 Did -- 13 MR. GINSBERG: I'm not asking you 14 whether you mean after on that date that he walked in 15 or any time after. 16 BY MR. HELLER: 17 Q Any time after that day. 18 MR. GINSBERG: Can you define business 19 relationship? 20 BY MR. HELLER: 21 Q Did you have any entity, did you participate 22 in any entity together where you both had a business 23 relationship, whether it was Blockchain Technologies, 24 the Synapse Foundation, Zap.org? 25 MR. GINSBERG: Objection. Form.</p>

14 (Pages 50 - 53)

<p style="text-align: right;">Page 54</p> <p>1 N. SPANOS 2 BY MR. HELLER: 3 Q You can answer. 4 MR. GINSBERG: If you can understand 5 it, you can answer. 6 THE WITNESS: I can't give you a yes or 7 no because you just put a triple bind in there. So if 8 I say yes, then that means yes to all three? 9 MR. HELLER: No. 10 THE WITNESS: You know, you've got to 11 make a question about it. 12 MR. HELLER: No. You -- 13 MR. GINSBERG: That's because the 14 question is objectionable as to form. If you could 15 break it down and ask straightforward questions -- 16 THE WITNESS: Yeah. 17 MR. GINSBERG: -- Mr. Spanos would do 18 his best to respond. 19 BY MR. HELLER: 20 Q Did you and Mr. Young have any business 21 relationship -- strike that. Did Blockchain 22 Technologies Inc. have any business relationship with 23 Ben Young or any entity with which Ben Young was 24 affiliated? 25 A Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 N. SPANOS 2 MR. GINSBERG: Objection as to form. 3 THE WITNESS: You guys said a bunch of 4 stuff and I got confused. I don't know. Can you say 5 it one more time, please? I'm sorry. 6 BY MR. HELLER: 7 Q What, if anything, did Mr. Young do 8 individually or on behalf of an entity with the 9 Synapse Foundation from a business standpoint, not an 10 individual standpoint? 11 A Talk a lot. 12 Q Did he have -- 13 A To girls too. 14 Q Did he have meetings? 15 MR. GINSBERG: Talking about a business 16 relationship. Did Young have a business relationship 17 with Synapse? 18 THE WITNESS: I don't think so. I 19 don't know. I mean, I don't remember if Young himself 20 had or maybe I didn't even -- was privy to it. But I 21 don't know. 22 I think, you know, Young was around a 23 lot. And he spoke knowledgeably and at the Bitcoin 24 Center, you know, years ago. But then he, you know -- 25 geez. I don't want to say anything bad. But he --</p>
<p style="text-align: right;">Page 55</p> <p>1 N. SPANOS 2 Q Okay. Was it with Mr. Young individually or 3 with an entity with whom which he was affiliated? 4 A I don't remember. 5 Q And did you or any -- no. Strike that. Did 6 Ben Young have any business relationship, Ben Young or 7 any entity with whom he was affiliated, have any 8 business relationship with the Synapse Foundation? 9 A Any relationship? 10 Q Any relationship. 11 A Sure. 12 Q Do you recall what that relationship was? 13 A No. I mean, I don't recall. Yeah. 14 Q Do you recall anything that Mr. Young or any 15 entity with whom he was affiliated did in connection 16 with the Synapse Foundation? 17 MR. GINSBERG: Objection. Assumes 18 facts not in evidence. 19 BY MR. HELLER: 20 Q You can answer. 21 MR. GINSBERG: The relationship could 22 be personal as well as professional, business as well 23 as non-business. 24 BY MR. HELLER: 25 Q Only in the business context.</p>	<p style="text-align: right;">Page 57</p> <p>1 N. SPANOS 2 anyway. 3 BY MR. HELLER: 4 Q Was Young the creative director of the 5 Synapse Foundation? 6 A No. 7 Q Was Young the creative director of Zap.org? 8 A Has he called himself that? Is that your 9 question? 10 MR. GINSBERG: The question is -- 11 THE WITNESS: Was he? 12 MR. GINSBERG: -- as an official title, 13 was he the creative director of Synapse -- 14 THE WITNESS: There was no 15 organizational chart to Zap.org and anyone calling the 16 Belarusians or some could get it changed. People 17 would change stuff, put whatever they want on there. 18 I think I found myself as the -- 19 MR. GINSBERG: Nick. 20 THE WITNESS: I'm sorry. 21 MR. GINSBERG: Did Young have the title 22 of creative director of Zap.org? 23 THE WITNESS: I'm not sure. 24 MR. GINSBERG: Yes or no? 25 THE WITNESS: I'm not sure. That's the</p>

15 (Pages 54 - 57)

<p>1 N. SPANOS 2 answer. 3 MR. GINSBERG: Not whether he gave it 4 to himself. As a matter of organization, did he have 5 that title? 6 THE WITNESS: No. I mean, I see it 7 here on the paper. 8 MR. GINSBERG: Nick, that's not the 9 question. 10 THE WITNESS: That's what that says. 11 MR. GINSBERG: That's not the question, 12 whether it's on that piece of paper or not. 13 THE WITNESS: Oh. Oh. 14 MR. GINSBERG: Based on your knowledge 15 of Zap.org, did he -- was he the creative director? 16 THE WITNESS: I'm not sure. 17 BY MR. HELLER: 18 Q Who would know whether or not Ben Young was 19 the creative director of Zap.org or of the Synapse 20 Foundation? 21 A I don't know. Iorgos? I don't know. 22 Q Who on behalf of the Synapse Foundation -- 23 A I've got to pee again. 24 Q -- makes a decision on who is involved in 25 providing services for the Synapse Foundation. Strike</p>	<p>Page 58</p> <p>1 N. SPANOS 2 THE WITNESS: It's too broad a 3 question. 4 BY MR. HELLER: 5 Q Were there attorneys involved in connection 6 with the initial coin offering of the Synapse 7 Foundation? 8 A Yes. 9 Q What are the names of those attorneys? 10 A I don't know. 11 Q Do you have any -- 12 A I don't remember. 13 Q Do you -- 14 A I probably would have known at one point. 15 Q Are there any documents that would refresh 16 your recollection as to the attorneys who prepared the 17 documents for the initial coin offering of the Synapse 18 Foundation? 19 A What does document mean? Paper? 20 Q A piece of paper. 21 A Paper? I don't think so. I don't have any. 22 Q Were there any electronic -- 23 A Probably. 24 Q Any who would have access to the electronic 25 filings or documents relating to the initial coin</p>
<p>1 N. SPANOS 2 that. 3 A Say it -- 4 Q I'll ask it another way. You mentioned an 5 organizational chart. 6 A No. 7 Q Is there an organizational -- no? 8 A I'm sorry. 9 MR. GINSBERG: There's no 10 organizational chart. That was his testimony. 11 MR. HELLER: Okay. 12 MR. GINSBERG: It's already been asked 13 and answered. 14 BY MR. HELLER: 15 Q Did the Synapse Foundation perform an 16 initial coin offering? 17 A So, yeah. 18 Q Were there documents prepared in connection 19 with the initial coin offering of the Synapse 20 Foundation? 21 A Probably. 22 Q Who prepared those documents? 23 A I mean, that'd be on the website, no? 24 MR. GINSBERG: Nick, who prepared them, 25 if you know?</p>	<p>Page 59</p> <p>1 N. SPANOS 2 offering for the Synapse Foundation? 3 A That would be -- Denmark or Isle of Man or 4 Switzerland. 5 Q Did you have access to any documents, 6 electronic documents in connection with the initial 7 coin offering of the Synapse Foundation? 8 A See, the issue is my eyesight was much, much 9 worse. I had many surgeries. I have a retinal -- I 10 have uveitis and retinal vasculitis. And they put 11 pellets in my eyes. And I've had many surgeries. And 12 documents were not that good to me because I can't 13 really see that well. 14 So it's a little difficult to recollect the 15 -- you know, either someone read it to me or it was 16 sent to someone else. I don't know. I don't 17 remember. Or we were there. 18 Q Did you have access to the electronic 19 documents? I didn't ask whether you read them. I 20 just want to know whether you had access. 21 A Oh. I can't say to all of them because I'm 22 not sure. But maybe. 23 Q Okay. Did you make any attempt to get those 24 electronic documents and give them to your attorney? 25 A I don't remember. Which attorney?</p>

<p>1 N. SPANOS 2 Q Mr. Ginsberg. 3 A No. 4 MR. GINSBERG: Objection. I think that 5 calls for attorney-client privilege. 6 MR. HELLER: No. It doesn't. 7 MR. GINSBERG: And you're also assuming 8 facts not in evidence. 9 BY MR. HELLER: 10 Q Answer the question. 11 MR. GINSBERG: If you want to start 12 with the basic question does Mr. Spanos have access to 13 those records now, then we can see where that goes. 14 But you're assuming he has access in asking that 15 question. 16 MR. HELLER: He answered the question. 17 And I did. 18 THE WITNESS: No. Can I go to the 19 bathroom? 20 MR. HELLER: Go to the bathroom. 21 THE WITNESS: Please? I drank too 22 much. 23 COURT REPORTER: Going off the record. 24 The time now is 11:53 a.m. 25 (Off the record.)</p>	<p>Page 62</p> <p>1 N. SPANOS 2 Q Who from the Synapse Foundation has access 3 to electronic files of the Synapse Foundation? 4 MR. GINSBERG: Objection. Assumes 5 facts not in evidence. 6 BY MR. HELLER: 7 Q Is there anyone from the Synapse Foundation 8 that has access to electronic files of the Synapse 9 Foundation? 10 MR. GINSBERG: If you know. 11 MR. HELLER: Hmm? 12 MR. GINSBERG: If he knows. 13 MR. HELLER: Mm-hmm. 14 THE WITNESS: I'm not sure. 15 BY MR. HELLER: 16 Q Are you currently a director of the Synapse 17 Foundation? 18 A No. 19 Q Do you play any role whatsoever currently in 20 connection with the Synapse Foundation? 21 A Well, there haven't been any phone calls for 22 a long time, so. 23 Q When was the last time there was a phone 24 call? 25 A I don't know. A while ago.</p>
<p>1 N. SPANOS 2 COURT REPORTER: We're back on the 3 record. The time now is 11:58 p.m. -- 11:58 a.m. and 4 I'm going to read back the last portion. 5 THE WITNESS: What time is it? I've 6 got to take my medicine. Do you know what time it is? 7 MR. GINSBERG: Noon. Noon. 8 THE WITNESS: Oh, we've got to get out 9 of here in 24 minutes. 10 (The reporter replayed the record as 11 requested.) 12 MR. HELLER: You know what, let him 13 just clarify what he wanted to say. 14 MR. GINSBERG: Did you want to clarify 15 your last answer? 16 THE WITNESS: You asked if I ever gave 17 -- I don't know. What was the question? You said 18 something about giving to Mr. Ginsberg or something, 19 giving papers to Mr. Ginsberg. 20 Well, there's no way I gave them to Mr. 21 Ginsberg because I didn't have any papers. So I said 22 no. And then I had to go to the bathroom. And I had 23 to go to the bathroom before. I was holding it in. 24 But anyway. Anyway. 25 BY MR. HELLER:</p>	<p>Page 63</p> <p>1 N. SPANOS 2 Q And who was that phone call with, the last 3 phone call? 4 A Clufetos. 5 Q Anyone else? 6 A It was a long time ago. 7 Q Is there anyone from the Synapse Foundation 8 who would have access to the electronic or paper 9 documents relating to the initial coin offering of the 10 Synapse Foundation? 11 MR. GINSBERG: Objection as to form. 12 Calls for -- a hypothetical question. Calls for 13 speculation. 14 BY MR. HELLER: 15 Q If you know the answer, you can answer. 16 A Say it again? 17 Q Do you know who from the Synapse Foundation 18 would have access to the electronic files or paper 19 files of the Synapse Foundation? 20 MR. GINSBERG: Objection to form. 21 THE WITNESS: I told you I don't know. 22 BY MR. HELLER: 23 Q Do you know if there is anyone currently 24 involved in the running of the Synapse Foundation? 25 A The people we said before.</p>

17 (Pages 62 - 65)

<p style="text-align: right;">Page 66</p> <p>1 N. SPANOS 2 Q Who are those people? 3 A I mean, it's -- I told you. Clufetos. I 4 forgot this guy's name. I don't know. The Danish 5 guy. I forgot his name. I don't know. There's 6 another person, two more people I don't remember. 7 One's like Tabby, Tabitha something. 8 Tabitha something. I don't know the last name. Okay? 9 I don't. I mean, you know, it took me a long time to 10 remember Herskowitz's name.</p> <p>11 Q When was the last time -- 12 A I don't think that way. I'm sorry. 13 Q When was the last time you or any entity 14 that you were affiliated with performed any 15 compensated or uncompensated services for the Synapse 16 Foundation?</p> <p>17 A Say that again. 18 Q When was the last time you or an individual 19 -- or an entity with which you were affiliated 20 performed any compensated or uncompensated services on 21 behalf of the Synapse Foundation?</p> <p>22 A A few months ago. I mean, probably a few 23 months ago. 24 Q What were those services? 25 A I don't know. Tweeting. I mean, you have</p>	<p style="text-align: right;">Page 68</p> <p>1 N. SPANOS 2 MR. HELLER: Yeah. Where does he spend 3 the majority of his time? 4 BY MR. HELLER: 5 Q More than 51 percent of your time, are you 6 in New York City, are you on the road, are you -- 7 MR. GINSBERG: Just one minute. 8 Objection. Assumes facts not in evidence. Assumes 9 Mr. Spanos is any place 51 percent of his time. 10 MR. HELLER: Well, he could tell me so. 11 MR. GINSBERG: Well, if you ask the 12 proper question, he could respond properly. 13 BY MR. HELLER: 14 Q Mr. Spanos, where do you reside? 15 A In New York City. 16 Q Do you maintain an office in New York City? 17 A No. 18 Q Where do you maintain an office? 19 MR. GINSBERG: Objection. Assumes 20 facts not in evidence. 21 BY MR. HELLER: 22 Q Do you have an office? 23 A Me? 24 Q Yes. 25 A No. I don't think so.</p>
<p style="text-align: right;">Page 67</p> <p>1 N. SPANOS 2 to understand that there's a community of people that, 3 you know, do things without any permission or -- 4 Q So you -- 5 A -- guidance or anything. There's a whole 6 community of software holders. I mean, you're calling 7 it ICO whatever. But it's software. 8 Q Did you have permission to perform those 9 services when you performed them? 10 A I had -- at their request. Yeah. It wasn't 11 even permission. It was -- 12 Q And who made the request? 13 A I think it was Clufetos. 14 Q And how was that request made? 15 A One of the auditory apps. 16 Q Where were you when that request was made? 17 A I don't really remember. 18 Q Where do you spend the majority of your 19 time? 20 A I'm on the road a lot, all over. 21 Q Where do you spend the majority of your 22 team? 23 MR. GINSBERG: You mean New York as 24 opposed to on the road or is he in New York more than 25 he's in the Isle of Man or --</p>	<p style="text-align: right;">Page 69</p> <p>1 N. SPANOS 2 Q Do you work -- do you currently work for a 3 company or an entity? 4 MR. GINSBERG: Do you get a W-2 or a 5 1044 from any company? 6 THE WITNESS: No. 7 BY MR. HELLER: 8 Q Do you get a 1099 from any company? 9 A This questioning -- 10 MR. GINSBERG: 1099. 11 THE WITNESS: No. I don't think so. I 12 don't know yet. I hope so. 13 MR. GINSBERG: Just answer the 14 question. 15 THE WITNESS: I just -- I'm trying to 16 answer, you know, factually. 17 BY MR. HELLER: 18 Q Last year in -- 19 A Oh, last year. 20 Q 2018, did you get a 1099 from any company? 21 A Not yet. 22 Q In 2018, did you maintain an ownership in 23 any entity? 24 A Yes. 25 Q Which entities did you maintain an ownership</p>

<p style="text-align: right;">Page 70</p> <p>1 N. SPANOS 2 in? 3 A Oh, I don't know. A lot of them. 4 Q Okay. Do you maintain an ownership in 5 Blockchain Technologies? 6 A No. 7 Q In 2018, you did not maintain an ownership 8 interest in Blockchain Technologies? 9 A No. 10 Q In 2018, did any entity with whom you -- 11 A He's not saying the name of the company 12 right. 13 MR. HERSKOWITZ: Blockchain 14 Technologies Corporation. 15 BY MR. HELLER: 16 Q In 2018, did you maintain an ownership 17 interest in Blockchain Technologies Corporation? 18 A Yes. You're saying -- you said with a Y. 19 That's another company, Blockchain Technology. That's 20 -- 21 Q I said technologies. 22 A Well, I didn't hear it. And then you didn't 23 say corporation. There's a lot of them. It's a very 24 -- there's a lot of companies with that name. 25 Q In 2018, did Blockchain Technologies</p>	<p style="text-align: right;">Page 72</p> <p>1 N. SPANOS 2 the Synapse group -- 3 A Yeah. 4 Q -- was it performed at the place you resided 5 or out of the place you worked in New York City? 6 MR. GINSBERG: Objection. I don't have 7 any idea what that question means. 8 MR. HELLER: Well, if he understands 9 it, he can answer. 10 THE WITNESS: I don't know what he 11 means. Can you say it again? 12 BY MR. HELLER: 13 Q When you were asked to perform services for 14 the Synapse Foundation a few months ago -- 15 A Yes. 16 Q -- was it out of your office in New York 17 City that you performed those services? 18 MR. GINSBERG: Objection. There was no 19 testimony that he performed any services. 20 MR. HELLER: Yes. There was. 21 MR. GINSBERG: No. There was testimony 22 that he was asked to perform services. 23 MR. HELLER: And he said he did. 24 MR. GINSBERG: I don't believe that's 25 correct. Ask him the question. Don't stare at me.</p>
<p style="text-align: right;">Page 71</p> <p>1 N. SPANOS 2 maintain an office -- 3 A I mean, if I didn't want to tell you, I 4 wouldn't have brought up the -- I'm trying to help you 5 ask me the question correctly. 6 Q That's fine. That's fine. In 2018, did 7 Blockchain Technologies Corporation have an office? 8 A Yes. Wait, 2009? 9 Q '18. 10 A '18. Yes. 11 Q Where was that office? 12 A There was a couple of places used. What 13 does Blockchain Technologies have to do with this? 14 Q Answer the question, please. 15 A I thought this was Zap. 16 Q Answer the question, please. 17 MR. GINSBERG: Just answer then. 18 THE WITNESS: Yeah. I had an office at 19 55 Wall Street. I think that's the address. 20 BY MR. HELLER: 21 Q Now you mentioned previously that in 2018 22 you resided -- strike that. You mentioned previously 23 that you reside in New York City and that you had an 24 office for Blockchain Technologies in New York City. 25 When you were asked to perform services on behalf of</p>	<p style="text-align: right;">Page 73</p> <p>1 N. SPANOS 2 THE WITNESS: He's angry, this guy. 3 BY MR. HELLER: 4 Q Mr. Spanos, you were asked to perform 5 services a few months ago on behalf of the Synapse 6 Foundation. 7 A Yeah. 8 Q Did you perform services on behalf of the 9 Synapse Foundation? 10 A Me? Or I don't understand the question. 11 MR. GINSBERG: You're being asked in 12 your individual capacity if you performed services for 13 Synapse Foundation a few months ago. And the answer 14 is yes or -- 15 THE WITNESS: Paid or unpaid? Yeah. 16 BY MR. HELLER: 17 Q Okay. And where did you perform those 18 services? 19 A I don't know where I was at the time. You 20 mean physically, in a three-dimensional world? 21 Q Yes. In a three-dimensional world. 22 A I'm not sure. In 20 -- what year, '18? I 23 think I -- 24 Q You said a few months ago you were asked to 25 perform services.</p>

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<p style="text-align: right;">Page 74</p> <p>1 N. SPANOS 2 A Oh, a few months ago. I don't remember 3 where I was. 4 Q When you were asked to perform the services 5 for the Synapse Foundation a few months ago, what were 6 you asked to do? 7 A I don't remember. I think something, 8 something to do with communication. 9 Q Communication with whom? 10 A Just communication, like to the public or 11 something. 12 Q And did you communicate to the public? 13 A I don't remember. Probably -- can I -- I 14 don't know. Can I ask someone? I mean, I don't 15 remember. 16 Q Well, who would you ask? 17 A I would ask if I did work -- I think it was 18 supposed to be a tweet or something I think. I don't 19 remember. I would ask probably the Danish guy or 20 Clufetos or someone. 21 Q Are you familiar with Satoshi Square? 22 A Yeah. 23 Q What is Satoshi Square? 24 A Satoshi Square is a group of people that 25 meet and trade bitcoin.</p>	<p style="text-align: right;">Page 76</p> <p>1 N. SPANOS 2 Square is. I'm entitled to ask me about Satoshi 3 Square. And when he tells me about it, I'll follow up 4 with the appropriate questions. 5 BY MR. HELLER: 6 Q Go. 7 MR. GINSBERG: Mr. Heller, first of 8 all, don't talk to my client that way. 9 MR. HELLER: I'm talking to you that 10 way. 11 MR. GINSBERG: Don't give -- excuse me? 12 MR. HELLER: I was talking to you that 13 way, not your client. 14 MR. GINSBERG: Go was directed towards 15 me? 16 MR. HELLER: Go was directed to your 17 client. I apologize for that. 18 BY MR. HELLER: 19 Q Go. Speak. 20 MR. GINSBERG: We would not step 21 outside and discuss how to respond to your inquiry. 22 That's a totally inappropriate suggestion. It is 23 beneath you. And I'm surprised you would even suggest 24 that. If you're representing to me in good faith that 25 Satoshi Square has a connection to whether Zap.org</p>
<p style="text-align: right;">Page 75</p> <p>1 N. SPANOS 2 Q How often do they meet? 3 MR. GINSBERG: Objection. This is -- 4 THE WITNESS: I have no idea. 5 MR. GINSBERG: Wait, wait, wait, wait. 6 Stop. Please slow down. If you can make a proffer as 7 to why this has anything to do with Zap -- 8 MR. HELLER: I don't have to make a 9 proffer. 10 MR. GINSBERG: Excuse me. Stop 11 interrupting me, please. This deposition is limited 12 to whether there is jurisdiction with regard to 13 Zap.org. 14 MR. HELLER: Mm-hmm. 15 MR. GINSBERG: All right. And I'm 16 asking you for a proffer as to how this is related to 17 that specific limited inquiry. If you're not going to 18 do it, I'm going to direct my client not to answer. 19 That's not right. You're taking -- 20 MR. HELLER: Absolutely not because if 21 I do make a proffer, then you and he could go outside 22 and discuss what the answer is and come back and tell 23 me what and what not. 24 MR. GINSBERG: Mr. Heller. 25 MR. HELLER: He knows what Satoshi</p>	<p style="text-align: right;">Page 77</p> <p>1 N. SPANOS 2 does or does not have an existence or jurisdiction or 3 whether there is New York jurisdiction over Zap.org, 4 I'll allow my client to respond. 5 MR. HELLER: Thank you. 6 MR. GINSBERG: But I'd like that good 7 faith proffer representation from you. 8 MR. HELLER: I will make a good faith 9 representation that I have found a connection, at 10 least online, between Satoshi Square and Zap.org 11 and/or the Synapse Foundation. 12 MR. GINSBERG: Okay. 13 MR. HELLER: So I would like to ask 14 your client questions about that. 15 MR. GINSBERG: Okay. 16 MR. HELLER: Thank you. 17 THE WITNESS: So like I said, what's 18 the question? 19 BY MR. HELLER: 20 Q What is Satoshi -- you said you are familiar 21 with Satoshi Square. 22 A Yeah. 23 Q How are you familiar with Satoshi Square? 24 A I said it's people who meet and trade 25 bitcoin or talk about bitcoin.</p>

<p style="text-align: right;">Page 78</p> <p>1 N. SPANOS 2 Q And do you know whether the Synapse 3 Foundation and/or Zap.org has any connection with 4 Satoshi Square? 5 A I don't think so. If they were -- you know, 6 I don't know. 7 MR. GINSBERG: Don't -- don't guess. 8 THE WITNESS: Yeah. I don't -- I don't 9 -- I don't know. It's not that I don't remember. I 10 don't know.</p> <p>11 BY MR. HELLER:</p> <p>12 Q So do you play any role currently in 13 connection with any marketing of Zap.org and/or the 14 Synapse Foundation?</p> <p>15 MR. GINSBERG: Objection. Assumes 16 facts not in evidence, whether Zap and Synapse, or 17 Synapse does any marketing.</p> <p>18 BY MR. HELLER:</p> <p>19 Q Does Zap.org and/or Synapse do any marketing 20 on behalf of that entity?</p> <p>21 A I don't know what market -- what you mean. 22 You know, marketing, what does that mean?</p> <p>23 Q Does it do anything to promote itself?</p> <p>24 A What does that mean?</p> <p>25 Q Advertisements.</p>	<p style="text-align: right;">Page 80</p> <p>1 N. SPANOS 2 technology and explain the incredible technology to 3 people. And I mean, I don't know what the definition 4 of spokesperson is because I'm not really from that 5 world, you know? I'm usually behind a computer all 6 the time.</p> <p>7 But I explain the technology pretty much. 8 If you're asking me what my duties are, I explain the 9 technology and that's what I do.</p> <p>10 Q Do you make any decisions relating to the 11 hiring or firing of anyone associated with the Synapse 12 Foundation?</p> <p>13 A No.</p> <p>14 Q Who -- do you know who from the Synapse 15 Foundation makes the decisions regarding the firing or 16 firing?</p> <p>17 A Nobody. There's no one hired. I don't 18 think you understand what these things are. It's not 19 what you think it is. You think it's like a regular 20 company or something like that. You just don't 21 understand what it is.</p> <p>22 It's a bunch of people. And if they own the 23 software, you know, they make recommendations. And 24 somehow there's a consensus reached and there's 25 thousands and thousands of people that own it. So I</p>
<p style="text-align: right;">Page 79</p> <p>1 N. SPANOS 2 A I don't know if it does -- you mean paid 3 advertisement? I don't know.</p> <p>4 Q Okay. Currently what role if anything do 5 you play --</p> <p>6 A I'm like --</p> <p>7 MR. GINSBERG: Wait, wait. Let him 8 finish question.</p> <p>9 BY MR. HELLER:</p> <p>10 Q -- on behalf of the Synapse Foundation?</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. GINSBERG: Listen. Take your time.</p> <p>13 THE WITNESS: All right. I want to 14 give him his answers fast --</p> <p>15 BY MR. HELLER:</p> <p>16 Q What role do you play --</p> <p>17 A -- because I'm frightened of this guy.</p> <p>18 Q What role, if any, do you play on behalf of 19 the Synapse Foundation today?</p> <p>20 A Okay. So I'm ad hoc spokesperson. I mean, 21 I've never -- like I said, I don't think -- you know, 22 there's no organizational chart that I know of. So 23 I'm a spokesperson because I'm visible in the 24 community.</p> <p>25 I make suggestions on the incredible</p>	<p style="text-align: right;">Page 81</p> <p>1 N. SPANOS 2 don't think you understand how it works.</p> <p>3 You're trying to -- you're trying for me to 4 express to you some corporate structure. It doesn't 5 work that way. And there's thousands of these types 6 of projects. And none of them work that way.</p> <p>7 So I don't know if you want a lesson. In 8 that I can explain, you know? But that's -- I don't 9 think you understand what it is.</p> <p>10 Q Well, maybe it'll speed things along if you 11 can explain it to me.</p> <p>12 MR. GINSBERG: Don't -- don't --</p> <p>13 THE WITNESS: I charge a lot of money.</p> <p>14 MR. GINSBERG: If there are questions 15 for --</p> <p>16 THE WITNESS: -- for that, a lot.</p> <p>17 MR. HELLER: Mark that as Spanos B</p> <p>18 (Exhibit Spanos B was marked for 19 identification.)</p> <p>20 THE WITNESS: So if I go to the 21 bathroom by myself, would you not be angry? I really 22 go to the bathroom a lot. I'm on medicine for 23 hypertension.</p> <p>24 MR. HELLER: Mr. Spanos, it's not 25 personal.</p>

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<p>1 N. SPANOS</p> <p>2 THE WITNESS: I don't need a conference</p> <p>3 or anything. I need to go to the bathroom a lot.</p> <p>4 MR. HELLER: That's fine. I apologize</p> <p>5 for suggesting that --</p> <p>6 THE WITNESS: So my lawyer can stray</p> <p>7 here.</p> <p>8 MR. HELLER: No, no. Your lawyer I</p> <p>9 trust implicitly.</p> <p>10 BY MR. HELLER:</p> <p>11 Q Mr. Spanos -- and by the way, if you do need</p> <p>12 to go to the bathroom, don't worry about it.</p> <p>13 A Thank you. Thank you.</p> <p>14 MR. GINSBERG: Do you have a copy of</p> <p>15 what you're showing him?</p> <p>16 MR. HELLER: Yes.</p> <p>17 THE WITNESS: Oh yeah, right there. 55</p> <p>18 Wall Street.</p> <p>19 MR. GINSBERG: And just wait -- thank</p> <p>20 you.</p> <p>21 THE WITNESS: Wow.</p> <p>22 BY MR. HELLER:</p> <p>23 Q Mr. Spanos, I've placed before you three</p> <p>24 documents Bates-stamped BTC_000991 through BTC_000993.</p> <p>25 And they appear to be invoices to Synapse Foundation</p>	<p>1 N. SPANOS</p> <p>2 Q In the middle of the first page, it says</p> <p>3 advance for ongoing work and expenses.</p> <p>4 A Oh, so I don't know.</p> <p>5 Q What ongoing work?</p> <p>6 A Well, like coding or something like that.</p> <p>7 I'm not sure.</p> <p>8 Q Do you know who from the foundation, an</p> <p>9 individual, hired Blockchain on behalf of Synapse</p> <p>10 Foundation?</p> <p>11 A Well, you know, that was a fight because,</p> <p>12 you know, they had cheaper labor elsewhere in Poland</p> <p>13 and Yugoslavia -- not Yugoslavia. Belorussia and</p> <p>14 Armenia. Cheaper labor.</p> <p>15 And it was a fight to even get it to this</p> <p>16 coding house here, whatever. If this was for coding,</p> <p>17 I'm not sure where it was in the timeline. I don't</p> <p>18 know.</p> <p>19 Q Do you know who from Synapse Foundation --</p> <p>20 A Yeah.</p> <p>21 Q -- hired Blockchain Technologies Corp. for</p> <p>22 ongoing --</p> <p>23 A Well, like I said, it was an argument --</p> <p>24 MR. GINSBERG: Let him finish the</p> <p>25 question.</p>
<p>1 N. SPANOS</p> <p>2 by Blockchain Technologies Corp.</p> <p>3 A Yeah.</p> <p>4 Q And they were produced by your counsel in</p> <p>5 connection with this lawsuit. Do you recognize these</p> <p>6 documents, these three pages?</p> <p>7 A I don't recognize the exact document. But I</p> <p>8 can attest. I don't know. I can probably -- yeah,</p> <p>9 whatever. I loosely recognize it.</p> <p>10 Q Okay.</p> <p>11 A I don't know that it's -- yeah.</p> <p>12 Q In your at least recognition of the</p> <p>13 documents, do you have an understanding of what these</p> <p>14 three documents relate to?</p> <p>15 A I think so. Yeah. I think so.</p> <p>16 Q Please let me finish the question before you</p> <p>17 answer.</p> <p>18 A Oh, I'm sorry.</p> <p>19 Q What do these three documents relate to?</p> <p>20 A I believe it was the foundation hired out</p> <p>21 Blockchain.</p> <p>22 Q To do what?</p> <p>23 A I don't -- it doesn't say. I don't know.</p> <p>24 Q It says --</p> <p>25 A I don't remember.</p>	<p>1 N. SPANOS</p> <p>2 THE WITNESS: I'm sorry.</p> <p>3 BY MR. HELLER:</p> <p>4 Q For ongoing work and to pay expenses.</p> <p>5 A What? Ongoing work and what?</p> <p>6 Q And expenses.</p> <p>7 A Where does it say that? It says that?</p> <p>8 Q Yes. It does.</p> <p>9 MR. GINSBERG: Objection. Assumes</p> <p>10 ongoing work.</p> <p>11 THE WITNESS: No. It says right here</p> <p>12 advance ongoing work and expenses.</p> <p>13 MR. GINSBERG: Oh, I'm sorry.</p> <p>14 THE WITNESS: There was a consensus</p> <p>15 somehow and, you know, there was an argument. But</p> <p>16 they wanted cheaper European or Asian work.</p> <p>17 BY MR. HELLER:</p> <p>18 Q Who is they?</p> <p>19 A So they gave some to us.</p> <p>20 Q Who was the consensus with?</p> <p>21 A People on the phone call.</p> <p>22 Q Who were on the phone call?</p> <p>23 A I don't remember. What date is this? Oh,</p> <p>24 2018. I still don't remember. February. I don't</p> <p>25 remember.</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 N. SPANOS 2 Q Was work performed by Blockchain 3 Technologies for Synapse Foundation? 4 A Yeah. 5 Q What type of work was performed? 6 A So Synapse Foundation hired Blockchain 7 Technologies to do work. I'm not sure exactly what 8 this invoice is for, what part of the work. 9 But different types of, I don't know, like 10 coding maybe on the backend, some encryption maybe. 11 I'm not sure. I don't remember the exact work. That 12 should be -- I don't know. 13 Q Did Synapse Foundation pay for the work? 14 A Yes. Right there. 15 Q At the time Synapse Foundation engaged 16 Blockchain Technologies to perform work for it, did 17 you have a role with Blockchain Technologies 18 Corporation? 19 A I was lobbying for Blockchain Technologies. 20 I was lobbying the foundation for Blockchain 21 Technologies to get some work. 22 Q Did you hold a position at that time with 23 Blockchain Technologies Corporation? 24 A Yes. 25 Q What was that position?</p>	<p style="text-align: right;">Page 88</p> <p>1 N. SPANOS 2 COURT REPORTER: Going off the record. 3 The time now is 12:28 p.m. 4 (Off the record.) 5 COURT REPORTER: We're back on the 6 record. The time now is 12:36 p.m. 7 BY MR. HELLER: 8 Q Okay. Mr. Spanos, you had previously 9 mentioned that you're familiar with Satoshi Square. 10 A Yeah. 11 Q Have you ever spoken at Satoshi Square? 12 A Sure. 13 Q Okay. How often do you speak at Satoshi 14 Square? 15 A Oh, I don't know. I don't know. 16 Q More than once a year? 17 A I don't know. Sometimes. 18 Q Okay. And have you spoken in Satoshi Square 19 in 2020? 20 A 2020? 21 Q Mm-hmm. 22 A I don't think so. 23 Q Did you speak at Satoshi Square in 2019? 24 A Listen, can I define Satoshi Square to you 25 better? Because --</p>
<p style="text-align: right;">Page 87</p> <p>1 N. SPANOS 2 A I don't know. The boss. I don't know. 3 What was it? Shareholder? I'm not sure. 4 Q Were you chief -- 5 A I don't know what it is. You know, I don't 6 know. 7 Q Do you recall whether you were chief 8 executive officer at that time? 9 A You know what? It probably says that in a 10 lot of places. And I'm not sure what the textbook 11 definition of chief executive officer is. People 12 might think I'm a businessman. But I'm more a 13 technologist. 14 Q Do you recall how Synapse Foundation paid 15 for the services, whether it was wire, check? 16 A I don't recall. 17 Q Turning your attention to the third page -- 18 A I think we're done. It's been two hours. 19 I've got to go to the bathroom. 20 Q You want to go before I ask the next 21 question? 22 A I'd like to go to the bathroom. 23 Q Okay. 24 A So we're going off the record here? 25 Q Yes.</p>	<p style="text-align: right;">Page 89</p> <p>1 N. SPANOS 2 Q Sure. 3 A Okay. So Satoshi Square is a bunch of guys. 4 And they don't even -- you know, a lot of them don't 5 even have their real name. And they show up and they 6 trade. 7 So when you say did I speak at Satoshi 8 Square, does that mean that I -- was I distinguished, 9 you know, these guys, they hate each other. They hate 10 everyone. I don't know what that means. Was I -- 11 Q Have you been someone for whom an 12 advertisement -- 13 MR. GINSBERG: Wait a minute. Were you 14 done, Nick? 15 THE WITNESS: Hmm? 16 MR. HELLER: Were you done? I'm sorry. 17 I interrupted you. 18 MR. GINSBERG: Were you done with your 19 answer? 20 BY MR. HELLER: 21 Q Were you done with your answer? 22 A I'm just saying he thinks like -- I don't 23 know what he thinks Satoshi Square is. Satoshi Square 24 is a bunch of random people that -- not random. It 25 comes from a group of people that were early bitcoin</p>

<p style="text-align: right;">Page 90</p> <p>1 N. SPANOS 2 traders. We used to trade in the park under Lincoln. 3 I think it was Lincoln statue in the north of Union 4 Square Park. Which statue is that? 5 MR. GINSBERG: Keep going, Nick. 6 THE WITNESS: And then we traded in 7 Whole Foods. And the guy that runs it -- ran that, I 8 don't know. In the beginning, there was like a meetup 9 or something and there was some guy in Panama. Ross. 10 Ross. Ross. I don't know. Ross. Ross. And -- 11 BY MR. HELLER: 12 Q Do you know where Satoshi Square is located? 13 A Nowhere and everywhere. 14 Q When you -- 15 A It's a decentralized thing. So we're 16 decentralists by definition. 17 Q Do individuals ever meet up in a particular 18 location? 19 A We used to meet up in the north of Union 20 Square in New York City where it started in like 2012, 21 2011, 2012, 2013. 22 Q Are you familiar with -- 23 A Early 2013, late 2012. 24 Q Are you familiar with a location called 45 25 Mott Street in Basement?</p>	<p style="text-align: right;">Page 92</p> <p>1 N. SPANOS 2 A It's hard to say. I mean, it depends what 3 your definition of sponsored is. Did they buy drinks? 4 Did they -- I don't know. You know what I mean? What 5 do you mean? 6 Q Did they buy drinks? 7 A Probably. 8 Q Did they buy food? 9 A I don't think so. Not in 2019. 10 Q Prior to 2019, did Zap.org buy food for 11 meetups at Satoshi Square? 12 A I don't think so. 13 Q How many times did Zap.org sponsor a meetup? 14 A I don't know. 15 Q Was it more than once? 16 MR. GINSBERG: Let him finish his 17 question. 18 THE WITNESS: I'm sorry. 19 BY MR. HELLER: 20 Q Was it more than once? 21 A I don't remember. Maybe. Because the 22 reason why I'm answering that way is when people get 23 together, everybody throws their name on stuff. So if 24 they threw Zap's name on it, you know what I mean, no 25 one enforced --</p>
<p style="text-align: right;">Page 91</p> <p>1 N. SPANOS 2 A Oh, yeah. Yeah. 3 Q And the individuals that make up Satoshi 4 Square ever meet -- have they ever met at 45 Mott 5 Street in the Basement? 6 A I think so. Yeah. 7 Q Okay. And have they met there more than 8 once? 9 A Yeah. 10 Q Have they met there -- do you recall whether 11 they met there -- 12 A This is not in the beginning of Satoshi 13 Square when -- you know, in the -- you're saying just 14 the -- what year is that? 15 Q 2019. 16 A Yeah. Okay. 17 Q Were there events at Satoshi Square ever 18 sponsored by Zap -- 19 A The 45 -- 20 MR. GINSBERG: Nick, you've got to let 21 him finish. 22 THE WITNESS: I'm sorry. 23 BY MR. HELLER: 24 Q Were there events or meetups in Satoshi 25 Square ever sponsored by Zap.org?</p>	<p style="text-align: right;">Page 93</p> <p>1 N. SPANOS 2 Q Who is they? 3 MR. GINSBERG: Wait. Were you done 4 with your answer? No one enforced? 5 THE WITNESS: Nobody enforced, you 6 know, loose, decentralized type people. No one 7 enforced, oh, you said that you sponsored or whatever. 8 You didn't give any money. 9 You know, it was nothing like -- if 10 there was a meetup, everyone threw their name in to 11 try to, you know, bring their group of people or 12 people that followed them or something to bring as 13 many people to the place as possible. Do you 14 understand me? It's not like an exclusive thing. 15 BY MR. HELLER: 16 Q Are you saying -- 17 A If that's what you're saying, you know -- 18 Q I'm not saying anything. 19 A Well, I'm sorry. Am I saying what? 20 Q That the individuals who indicated that 21 Zap.org was sponsoring an event at Satoshi Square did 22 not have permission to put Zap.org's name -- 23 A There's no one in charge of Satoshi Square. 24 It's just a gathering of people. So when people say, 25 hey, Satoshi Square, all this means, you know, if</p>

24 (Pages 90 - 93)

<p style="text-align: right;">Page 94</p> <p>1 N. SPANOS 2 you're a bitcoiner, show up. Josh Jeffries -- no, 3 Josh. I forgot his last name -- used to have creative 4 control, creative control. I don't know. Used to 5 have a curated thing. 6 But this is back six years ago. And he 7 moved out of the country. And his -- he, you know -- 8 and plus, Satoshi Square is all over the world. It's 9 like a Toastmasters. How about Toastmasters? I don't 10 know what Toastmasters is. 11 But if there was a Toastmasters of bitcoin - 12 - but Satoshi Square doesn't train you. You know, 13 it's not an entity. It's not -- I'm trying to explain 14 to you what it is in the real world. You guys have -- 15 Q Who is Rachel Siegel? 16 A Rachel Siegel is an influencer. 17 Q Do you know whether she has ever hosted an 18 event at Satoshi Square at 45 Mott? 19 A So when you say has she ever hosted an 20 event, did she have the microphone? Is that what 21 you're saying? 22 Q It says she's the host, so. 23 A Yeah. But did you look up if there were any 24 other hosts on the same night? You know what I mean? 25 I'm not sure.</p>	<p style="text-align: right;">Page 96</p> <p>1 N. SPANOS 2 That happens all the time. Like someone 3 asks one foundation. They ask another foundation. 4 You know, and then if you have a good name, you might 5 be able to get 10 foundations' names. And you would 6 get their cryptocurrency sent to you. And they don't 7 care where the hell it is as long as, you know, they 8 believe that you're going to put their logo somewhere. 9 So I'm not sure if I was at that event. 10 I've been -- I think they had events there for a long 11 time, Satoshi Square for how many -- many times, 12 right? And I might have been there twice I think or 13 three times. And they might have had them there for I 14 don't know how many times. 15 Q And on -- 16 A Dozens. I'm not sure. 17 Q And on -- 18 A I had no control. 19 Q No control over? 20 A Over those events or design of the events or 21 -- meaning the events you're talking about. Yeah. 22 And people -- I mean, it happens all the time. Did 23 someone use my name to get the thing? Maybe. 24 MR. GINSBERG: Don't speculate or 25 guess.</p>
<p style="text-align: right;">Page 95</p> <p>1 N. SPANOS 2 Q Have you ever witnessed her being a host? 3 A Yes. 4 Q And have you ever witnessed her as being a 5 host of an event at Satoshi Square that Zap.org 6 sponsored? 7 A So if -- I'm not sure exactly what you 8 perceive sponsoring is. I think we have two different 9 ideas of what the word sponsor means. So -- 10 Q What's your idea of the word sponsor? 11 A Sponsors like rent the place out or do, you 12 know, all kinds of stuff like that. So yeah, you 13 know, Zap.org never rented a place, you know, where 14 did you say? What was the address? 15 Q 45 Mott. 16 A That's a bar. 17 Q So, but Zap.org bought the drinks? 18 A I could -- I could imagine that Zap.org sent 19 to someone, someone requested for them to pay for the 20 drinks. And those guys sent some kind of 21 cryptocurrency which thereby someone else, not me, 22 converted the cryptocurrency and bought drink tickets, 23 I believe, because there were drink tickets being 24 handed out. I assume that would be it. I really 25 don't know.</p>	<p style="text-align: right;">Page 97</p> <p>1 N. SPANOS 2 THE WITNESS: Yeah. Yeah. 3 MR. GINSBERG: Just -- if there's a 4 question, just respond to it. 5 THE WITNESS: Okay. I'm sorry. I just 6 want people to get -- you know, understand the 7 industry. 8 MR. GINSBERG: Okay. There's no 9 question pending. 10 THE WITNESS: You know what I mean? 11 Like you're trying to fit it into this square world. 12 It's a disorganized hodgepodge of, you know, 13 cryptocurrency enthusiasts, anarchical capitalists, 14 libertarians. I mean, it's just a bunch of cats 15 herding cats. 16 You know? It doesn't -- there's no 17 rhyme or reason. I don't take anything personal. I 18 just don't do anything. I try not to do -- I mean, 19 that's what it is, you know, trying to like paint some 20 kind of picture to people who don't understand the 21 industry. 22 BY MR. HELLER: 23 Q But you had -- but you had nothing to do 24 with the sponsoring by Zap.org of any of these events. 25 Is that correct?</p>

25 (Pages 94 - 97)

<p style="text-align: right;">Page 98</p> <p>1 N. SPANOS 2 A Yeah. I did not pay for them. 3 Q You didn't personally? 4 A No. 5 Q Okay. So you have no idea how many events 6 Zap.org sponsored and paid for the alcohol at these 7 events? 8 A No. I get -- anyway, whatever. I get 9 emails, or not emails. What the hell is it called? 10 MR. GINSBERG: There's no question. 11 THE WITNESS: Tweets. 12 BY MR. HELLER: 13 Q Have you ever represented Zap.org in -- 14 yeah; at any tradeshows? 15 A Yeah. I put the banner. I have a couple of 16 slides at the end of a 30- or 40-slide presentation 17 that I have. I have, you know, two or three slides 18 for Zap. 19 Q Have you ever stood in a Zap booth at a 20 tradeshow? 21 A I've sat at a Zap booth when I was tired. 22 Q Have you ever stood in a Zap booth? 23 A Probably stood before I sat. 24 Q Okay. And have there been Zap booths around 25 the country?</p>	<p style="text-align: right;">Page 100</p> <p>1 N. SPANOS 2 A On behalf of? 3 Q Yes. 4 MR. GINSBERG: Yes. On behalf of was 5 the question. 6 THE WITNESS: That's a pretty good 7 question you've got there. Like I said, I have 40 or 8 20 or 30 slides and then I put in a couple Zap.org 9 slides at the end of the presentation, of my 10 presentations to explain the technology. 11 BY MR. HELLER: 12 Q Okay. And so, those presentations -- 13 A And I've done that in Belarus. I've done it 14 -- I don't know if I did it in Belarus. I've done it 15 all over the world. 16 Q And you've done it in New York? 17 A Yeah. I think so. 18 MR. GINSBERG: Don't guess. 19 THE WITNESS: I don't remember. 20 MR. GINSBERG: Do you remember ever 21 doing it in New York? 22 THE WITNESS: Listen, it's a blur. But 23 I believe I must have done it in New York. 24 MR. GINSBERG: Don't -- 25 THE WITNESS: I've done it in Florida.</p>
<p style="text-align: right;">Page 99</p> <p>1 N. SPANOS 2 A Around the world probably. 3 Q Okay. Ever a Zap booth in New York? 4 A I don't remember. But yeah, maybe. Yeah. 5 Maybe. I don't remember. Maybe. 6 Q When -- 7 A Do you have something that can refresh my 8 memory? Because I don't remember. 9 Q Well, I just -- 10 A I've been to dozens and dozens and dozens of 11 tradeshows over the year. I don't remember what city 12 I'm in, you know. 13 Q Have you ever been to a tradeshow -- 14 A The hotels look the same to me. 15 Q Have you ever been to a tradeshow in New 16 York relating -- 17 A I have. But I don't -- 18 MR. GINSBERG: Let him finish the 19 question, Nick. 20 THE WITNESS: I'm sorry. 21 BY MR. HELLER: 22 Q Have you ever been to a tradeshow in New 23 York which you were there on behalf of Zap.org? 24 A On behalf of? 25 Q Or the Synapse Foundation.</p>	<p style="text-align: right;">Page 101</p> <p>1 N. SPANOS 2 Is that okay? 3 MR. GINSBERG: Nick, do you recall -- 4 THE WITNESS: I don't -- listen -- 5 MR. GINSBERG: -- ever doing it in New 6 York? 7 THE WITNESS: I'm not a hundred percent 8 positive. I'm 78 percent. You know, I'm not a 9 hundred percent positive because I don't remember. 10 Yeah. I've done it in New York, meaning the slides. 11 BY MR. HELLER: 12 Q Yes. 13 A I've had two or three slides after a long 14 slideshow for Zap. Yes. 15 Q In New York? 16 A Yes. I remember now. Thank you. In 17 addition to -- 18 (Exhibit Spanos C was marked for 19 identification.) 20 BY MR. HELLER: 21 Q I only have two of these. But I'll make a 22 copy. 23 A That doesn't look like me. 24 MR. GINSBERG: But I want to finish 25 your question in addition to what you were asking him.</p>

<p style="text-align: right;">Page 102</p> <p>1 N. SPANOS 2 MR. HELLER: In addition to? 3 THE WITNESS: You want me to finish the 4 question? 5 MR. GINSBERG: I want you to finish the 6 answer. You said you had two slides after a long deck 7 of slides in addition to something. And then you 8 stopped. You were interrupted. 9 THE WITNESS: I don't remember what I 10 was saying.</p> <p>11 BY MR. HELLER:</p> <p>12 Q Okay. Mr. Spanos, I've placed before you 13 what is a --</p> <p>14 MR. GINSBERG: Is this -- I'm sorry. 15 Is this for me?</p> <p>16 MR. HELLER: Yeah. You can have that.</p> <p>17 BY MR. HELLER:</p> <p>18 Q There's a document that's been marked as 19 defendant -- Spanos C.</p> <p>20 A I can't see it.</p> <p>21 Q And it appears to be a picture of you in 22 front of a Zap.org booth. Do you recognize that?</p> <p>23 A Yeah. It looks like the inside of a hotel 24 with a Zap.org booth which I've had in dozens of 25 different countries around the world.</p>	<p style="text-align: right;">Page 104</p> <p>1 N. SPANOS 2 A Or 80 something maybe. I don't know what 3 the definition of a tradeshow is. But, and of those 4 times, I'm not sure. I'm not sure how many times 5 there was a booth. Like before you asked me about a 6 slide show. There've been events that, you know, Zap 7 was at. They had booths. I wasn't there. 8 Q But you know Zap has had booths at 9 tradeshows in New York. You don't know how many. But 10 Zap has had booths.</p> <p>11 A I don't -- yeah. I just don't know the 12 exact number or -- I mean, now I'm recollecting. I 13 said before that 78 percent. But a hundred -- you 14 know, 78 percent I thought. But now I'm recollecting 15 a little more. I just don't know how many times.</p> <p>16 MR. GINSBERG: Seventy-eight percent of 17 what?</p> <p>18 THE WITNESS: Seventy-eight percent of 19 my brain is saying yes.</p> <p>20 MR. GINSBERG: Yes what?</p> <p>21 THE WITNESS: Yes. Zap has had booths 22 in New York. I just don't remember a hundred percent 23 where. For sure I don't remember when or what the 24 name of the tradeshow was or who was there or even if 25 I was there. For sure I don't remember that.</p>
<p style="text-align: right;">Page 103</p> <p>1 N. SPANOS 2 Q And have you -- do you recall ever being in 3 front of a booth of Zap.org in New York City, in a 4 hotel in New York City? 5 A I could believe that I have been. But I 6 don't remember this certain -- like I couldn't tell 7 you what hotel this is or what event it is. 8 MR. GINSBERG: Nick, do you recall in 9 New York being in front of a Zap.org -- 10 THE WITNESS: Yeah. I said 78 percent. 11 So now it's probably more. I just don't remember 12 because there's so many events that I get invited to. 13 BY MR. HELLER: 14 Q Do you know how many tradeshows there are in 15 New York City annually relating to bitcoin? 16 A Probably a lot. 17 Q And does Zap.org have a booth each time? 18 A I don't think so. No. No way. 19 Q Does Zap.org have a booth at various times 20 during these tradeshows in New York City? 21 A Zap.org, I mean, now with this picture, I 22 don't know. Probably. It's been I'm not sure how 23 many times. But there have probably been hundreds, at 24 least a hundred tradeshows in New York probably. 25 Q Yes.</p>	<p style="text-align: right;">Page 105</p> <p>1 N. SPANOS 2 BY MR. HELLER: 3 Q Do you know -- 4 A Or even if I have known that at the time 5 that it happened. I might have learned after. But 6 it's all a blur to me. There's booths all over the 7 world. There's booths in all over the world. 8 Q Do you know the purpose of the booth that 9 Zap has at a particular tradeshow, why it was placing 10 booths at tradeshows? 11 A To explain the technology. 12 Q Okay. And did Zap have individuals that it 13 -- paid or unpaid, representing the company at these 14 booths to explain the technology? 15 MR. GINSBERG: If you know. Don't 16 guess. 17 THE WITNESS: Who have explained? 18 Yeah. 19 BY MR. HELLER: 20 Q And at times, were you one of those 21 individuals in the booth to explain the technology? 22 A Listen, when I sit at a booth, all of a 23 sudden there's a big crowd. I can't even breathe, 24 that comes around me. So am I -- do I have to man the 25 booth? No.</p>

<p style="text-align: right;">Page 106</p> <p>1 N. SPANOS 2 Q But there's usually somebody -- 3 A Is there a schedule? Am I on it? No. 4 Q Is there -- 5 A I don't even know if there's a schedule. 6 Q But to the best of your knowledge, there is 7 someone with knowledge of the technology who would be 8 at the booth to explain the technology. 9 A I suppose. I hope so. I hope so. You? 10 Q Are you familiar with an individual by the 11 name of Tom St. Laurent? 12 A Yeah. 13 Q Please tell me how you're familiar with Tom 14 St. Laurent. 15 A Tom St. Laurent is a technology guy. And 16 how I met him? What's the question? 17 Q How are you familiar with him? How'd you 18 become familiar with him? How'd you meet him? 19 A Okay. Thanks. I'm not familiar with 20 anybody. 21 Q I don't want to know. 22 A I'm just saying I don't know what you mean 23 by -- that's not my -- that's not my addiction there. 24 I met him -- I met him -- I think I met him on Wall 25 Street one time.</p>	<p style="text-align: right;">Page 108</p> <p>1 N. SPANOS 2 A I don't think so. 3 Q Is he currently the technical director of 4 Zap.org? 5 A I don't think so. 6 Q Was Tom St. Laurent ever the technical 7 director of the Synapse Foundation? 8 A If there was someone to be called, meaning 9 like is aid before that these titles are really not 10 that -- have any meaning whatsoever. But is he a 11 smart guy and gave good suggestions and good 12 recommendations? Yes. 13 Q Was Tom St. Laurent ever compensated by the 14 Synapse Foundation? 15 A I'm not sure. I think so. 16 Q Do you know where Tom St. Laurent resides? 17 A No. 18 Q Do you know what state he resides in? 19 A I'm thinking New Jersey. I don't know. 20 Q Do you know if Tom St. -- 21 A Or New York or New Jersey. I don't know. 22 Connecticut. New York, New Jersey or Connecticut. 23 Q Do you -- 24 A I'm not sure if he resides there. But I 25 know that he -- you know --</p>
<p style="text-align: right;">Page 107</p> <p>1 N. SPANOS 2 Q Okay. Was Tom -- 3 A The first time. 4 Q Was Tom St. Laurent ever affiliated with the 5 Bitcoin Center of New York City? 6 A Yeah. No. No. 7 Q Was Tom St. Laurent -- 8 A He came by the Bitcoin Center. But I'm not 9 sure how many times. But I could probably count it on 10 one hand. I don't remember. 11 I only remember him like, you know, just 12 like 200 people every Monday, 300, 500 people every 13 Monday, 300 other people every Thursday, 40 or 50 14 people there day to day, every day. Just like them. 15 He came by. 16 Q Okay. Did Tom -- 17 A He had no position at the Bitcoin Center. 18 The reason why you're asking me this question is 19 because the default of the programmers were to -- the 20 default of the little box that said affiliation or 21 previous job or I don't know what -- it doesn't say 22 anything. It just says Bitcoin Center under a bunch 23 of people. That was the default of that website. 24 Q Is Tom St. Laurent, is he currently the 25 technical director of the Synapse Foundation?</p>	<p style="text-align: right;">Page 109</p> <p>1 N. SPANOS 2 Q Do you have any -- 3 A He has slept there in the past. Maybe it's 4 a girlfriend. I don't know. 5 Q Do you know if Tom St. Laurent is employed 6 by an individual or an entity? 7 A No. 8 Q Do you know whether he maintains an office 9 to work out of? 10 A No. 11 Q Have you ever visited Tom St. Laurent at an 12 office? 13 A Have I seen him in an office? 14 Q Yes. 15 A Yeah. 16 Q And where was that office located? 17 A I've seen him in my real estate office. 18 Q Your personal real estate office or your 19 entity? 20 A Not my personal real estate office. I used 21 to have shares of a corporation with some other 22 people. And there was a real estate office. 23 Q And so, you met him in your office? 24 A No. I met him on Wall Street. 25 Q No. I'm asking --</p>

<p style="text-align: right;">Page 110</p> <p>1 N. SPANOS 2 A I'm sorry. 3 Q -- if you ever had a meeting with him in a 4 business office. And you said it was a real estate -- 5 your real estate office. 6 MR. GINSBERG: Objection. He didn't 7 say he had a meeting with him. 8 THE WITNESS: Yeah. You asked me -- 9 MR. GINSBERG: You asked him if he ever 10 saw him in an office. 11 BY MR. HELLER: 12 Q Saw him. Okay. I apologize. Did you ever 13 see Mr. St. Laurent in an office that was not an 14 office that you worked out of? 15 A In an office? 16 Q Yeah. 17 A You're asking me if, you know, I worked out 18 of an office. I never said that. I said I owned part 19 of a real estate company. 20 Q Okay. Let's go back just to make this 21 clear. Have you ever met with Tom St. Laurent in an 22 office in New York City? 23 A Yes. 24 Q Okay. How many times? 25 A I don't remember.</p>	<p style="text-align: right;">Page 112</p> <p>1 N. SPANOS 2 A Not that I know of. I don't think so. 3 Q Do you have any access to any electronic 4 devices that would have Steve Geros' business address? 5 A I don't know. 6 Q Have you ever communicated with Steve Geros 7 electronically? 8 A Yeah. 9 Q Do you maintain copies of electronic emails 10 that are received from Steve Geros? 11 A No. 12 MR. GINSBERG: Objection. There's been 13 no testimony there were electronic emails received 14 from Steve Geros. 15 MR. HELLER: Say that again? 16 MR. GINSBERG: The testimony was not 17 that he received electronic emails from Steve Geros. 18 You asked him if he communicated electronically. 19 THE WITNESS: Yeah. 20 MR. GINSBERG: And as Mr. Spanos 21 previously told you, that includes phones and phone 22 apps. 23 MR. HELLER: Gotcha. 24 BY MR. HELLER: 25 Q Have you ever communicated with Steve Geros</p>
<p style="text-align: right;">Page 111</p> <p>1 N. SPANOS 2 Q More than once? 3 A Yes. 4 Q Do you recall where that office was? 5 A Yes. 6 Q Okay. Where was that office? 7 A It was at a real estate company which I 8 owned shares of which is not there anymore. 9 Q Did you ever meet him in a different office 10 in New York City? 11 A I don't remember. I don't think so. No. 12 Q Do you have any access to any electronic 13 devices that would have Tom St. Laurent's address? 14 A No. 15 Q Do you have access to any electronic devices 16 that would have Steve Geros' address? 17 MR. GINSBERG: I'm sorry? What was the 18 name? 19 MR. HELLER: Steve Geros. G-E-R-O-S. 20 THE WITNESS: No. Where he lives? 21 Where these guys live? 22 BY MR. HELLER: 23 Q Yeah. 24 A No. 25 Q Do you have any access to --</p>	<p style="text-align: right;">Page 113</p> <p>1 N. SPANOS 2 through email? 3 A I don't know. Probably. I think. 4 Q Have you performed a search of your email to 5 see if you found any emails with Steve Geros? 6 A I had someone perform the search because I 7 don't really get into the email thing. 8 Q Who performed the search? 9 A I don't remember. Some girl. 10 Q When was the search performed? 11 A Hold on. Let me think. Let me think. I 12 don't remember who looked at the computer and went 13 through the stuff. 14 Q Do you recall when? 15 A I don't know. A few months ago and I gave 16 them to the lawyer. 17 Q What did you give to the lawyer? 18 A A bunch of emails. They didn't give them to 19 you? 20 Q Emails with Steve Geros? 21 A I'm not sure. You're asking me -- you're 22 talking to someone who doesn't really read the email, 23 right? And then you're asking me if I sent or if I 24 had an email from someone. I have an email from a lot 25 of people probably. They don't get answered. I have</p>

<p style="text-align: right;">Page 114</p> <p>1 N. SPANOS 2 unanswered email in my world. My world is a bunch of 3 unanswered email because I can't read. 4 I mean, I know how to read. I used to read. 5 But it just hurts me too much and it makes me dizzy. 6 So I've had many eye surgeries. So I have a very high 7 white blood cell count because I was down at the 8 Ground Zero. And I got 20,000 parts per million 9 lymphocytes. And I'm probably about to die out here 10 with this coronavirus. I should not be out here. 11 But I came out here to answer your 12 questions. So I'm trying to. But you're asking me 13 things that probably -- anyway. Keep going. I'm 14 answering everything you've got. I'm answering 15 everything you're asking me accurately I believe. 16 Q So do you know whether you have unanswered 17 emails from Ben Young? 18 A I have no idea. Probably. I'm not sure 19 because I tell everyone don't send me any emails 20 because I don't answer them. Did you send me emails 21 that I haven't answered? 22 Q Do you have -- 23 A Mr. Ginsberg? 24 MR. GINSBERG: I'm not being 25 questioned.</p>	<p style="text-align: right;">Page 116</p> <p>1 N. SPANOS 2 way with Zap.org? 3 A It just sounds familiar. The name sounds 4 familiar from, you know, like many -- a few years ago. 5 I think I'm not sure. 6 Q Okay. 7 A Maybe that's some Wall Street guy. I don't 8 know. 9 Q I'm going to take a two-minute break. I'm 10 going to talk to my client for a minute and then we're 11 going to decide what additional questions to ask, 12 okay? 13 MR. GINSBERG: Sure. 14 THE WITNESS: Can I go to the bathroom 15 again? 16 MR. HELLER: Yes, you can. 17 THE WITNESS: All right. Thank you. 18 MR. HELLER: We're going off the 19 record. 20 COURT REPORTER: We're going off the 21 record. The time now is 1:08 p.m. 22 (Off the record.) 23 COURT REPORTER: We're back on the 24 record. The time now is 1:14 p.m. 25 THE WITNESS: Thank you. Thank you.</p>
<p style="text-align: right;">Page 115</p> <p>1 N. SPANOS 2 THE WITNESS: Can you answer the 3 question? 4 MR. HELLER: I can't answer that 5 question because it would be an attorney-client -- 6 THE WITNESS: Well, he's laughing 7 because, yeah, I don't read email. 8 BY MR. HELLER: 9 Q Okay. Now we're going to talk about Tom St. 10 Laurent. Do you have unanswered emails from Tom St. 11 Laurent? 12 A I'm not sure. 13 Q Same question regarding Eric Dixon. 14 A I'm not sure. I know that there's 200,000, 15 300,000 unanswered emails, unread emails in my 16 mailbox. 17 Q Who is -- are you familiar with an 18 individual by the name of Evan Renov, R-E-N-O-V? 19 A No. Maybe. What's the name again? 20 Q Evan Renov. R-E-N-O-V. 21 A Sounds familiar. 22 Q Do you know whether he's affiliated in any 23 way with the Synapse Foundation? 24 A I'm not sure. 25 Q Do you know whether he's affiliated in any</p>	<p style="text-align: right;">Page 117</p> <p>1 N. SPANOS 2 MR. HELLER: No problem. 3 BY MR. HELLER: 4 Q Mr. Spanos, who built the technology for 5 Zap.org? 6 A A bunch of people. 7 Q Okay. Could you name them? 8 A A lot I think were bounties. So a lot of 9 misconceptions about this industry, which is a new 10 industry and a lot of people don't understand is that 11 most of the work is done with bounties to the 12 programmers that are known by their handle or maybe 13 not known because it doesn't matter because it's an 14 open source project. 15 And if they enter into the GitHub and that 16 branch is accepted, they would get some kind of bounty 17 in cryptocurrency from the foundation. So it's a very 18 big communication gap because this industry's not like 19 any industry that anyone's seen before. And that's 20 why the questions are a little -- many of the 21 questions are a little -- they could have been better 22 questions if you understood the industry. 23 I'm not saying that you're not smart. 24 You're a very smart, brilliant guy. This is a certain 25 type of industry that it's more on the -- fancies</p>

<p style="text-align: right;">Page 118</p> <p>1 N. SPANOS 2 itself to be of the decentralized nation -- nature, 3 which -- so bounties such as the developer of -- the 4 creator of Bitcoin. No one knows who he is. He did 5 an incredible job. He has a pseudonym named Satoshi 6 Nakamoto. But no one knows who he is. 7 So many -- a lot of code is written through 8 bounties and others. And if you go on the GitHub, you 9 know, you'll see there's hundreds of people. I don't 10 know how many people, from all walks of -- you don't 11 even know who they are because they'll never tell you 12 probably.</p> <p>13 Q So did Blockchain Technologies Corporation 14 help build --</p> <p>15 A Some part. Yeah.</p> <p>16 Q -- Zap.org?</p> <p>17 MR. GINSBERG: Let him finish his 18 question.</p> <p>19 THE WITNESS: I'm sorry. I'm sorry 20 BY MR. HELLER:</p> <p>21 Q Zap.org. And the answer is some part.</p> <p>22 A Yeah. Some part probably.</p> <p>23 Q Okay. Did Blockchain Technologies 24 Corporation start the process of building the 25 technology or that was started somewhere else?</p>	<p style="text-align: right;">Page 120</p> <p>1 N. SPANOS 2 A No, no. I don't -- I didn't say that you 3 made it up. I just said I'm not really familiar a 4 hundred percent. I could see where this was created. 5 But I'm not familiar with this document myself 6 personally. That's what I'm saying.</p> <p>7 Q Do you know whether other than these three 8 invoices that are next to defendant's Exhibit B in the 9 aggregate amount of \$20,000, whether there was any 10 additional money paid by the Synapse Foundation to 11 Blockchain Technologies --</p> <p>12 A Probably.</p> <p>13 Q -- for services provided on its behalf? Why 14 do you say probably? Do you --</p> <p>15 A I'm not an accountant. I'm not the 16 accountant. I'm not anything. I don't know about 17 this. I can't -- I told you I can't see. I won't -- 18 trust myself to see. Maybe it's the wrong thing. 19 Maybe I should get a projection screen TV and sit in 20 front of it all day --</p> <p>21 Q From what --</p> <p>22 A -- and try to read.</p> <p>23 Q From what period of time to what period of 24 time did Blockchain Technologies Corporation provide 25 services for the Synapse Foundation?</p>
<p style="text-align: right;">Page 119</p> <p>1 N. SPANOS 2 A Oh, I don't know. Blockchain Technologies 3 Corporation was paid by the Synapse Foundation to help 4 out in some places after I begged and pleaded for them 5 to hire Blockchain Technologies for a few things. 6 Q And how was Blockchain Technologies paid? 7 In bitcoin?</p> <p>8 A You got it right there.</p> <p>9 Q Was it paid in U.S. dollars or in --</p> <p>10 A I don't know. You showed it to me. I 11 haven't really never seen it. I mean, I think I 12 understand what it is. But I've never see this thing.</p> <p>13 Q Just to let you know --</p> <p>14 A I mean, for all I know, you made this up. I 15 don't think so. I think it's actually an invoice from 16 Blockchain Technologies to the Synapse Foundation 17 where the Synapse Foundation paid for Blockchain 18 Technologies to do some work.</p> <p>19 MR. GINSBERG: And Mr. Spanos is 20 pointing to Spanos Exhibit B.</p> <p>21 BY MR. HELLER:</p> <p>22 Q He is, and just to let you know that these 23 documents were produced by your counsel, so.</p> <p>24 A Okay.</p> <p>25 Q We didn't make anything up.</p>	<p style="text-align: right;">Page 121</p> <p>1 N. SPANOS 2 A I don't know. I don't know exactly. I 3 mean, I don't remember.</p> <p>4 Q Who --</p> <p>5 A Not I don't know. I don't remember.</p> <p>6 Q Who from Blockchain Technologies Corporation 7 worked on the Synapse Foundation project for which 8 Blockchain Technologies was paid?</p> <p>9 A Say that again.</p> <p>10 Q Who from Blockchain Technologies Corporation 11 --</p> <p>12 A Yeah.</p> <p>13 Q -- worked on the Synapse Foundation project 14 for which Blockchain -- for which Blockchain 15 Technologies was paid?</p> <p>16 A Who from -- who from Blockchain Technologies 17 Corp. worked on things that Synapse paid for? I don't 18 know. I mean, not I don't know. I don't remember. 19 But --</p> <p>20 Q Do you have any records that would refresh 21 your recollection as to who worked on it?</p> <p>22 A I'd have to go over Blockchain stuff, get 23 someone to look at the Blockchain stuff, Blockchain 24 Technologies stuff to look at that. I mean, I don't 25 remember. For sure it was people. I don't know.</p>

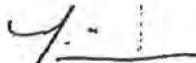
<p style="text-align: right;">Page 122</p> <p>1 N. SPANOS 2 Q Did you receive any -- 3 A Or subcontractors. There's subcontractors, 4 right? Like 1099s which have -- I mean, you have 5 1099s or whatever over there. Checks. There were 6 checks that were sent to you, right? Yeah. No? 7 Q Not in connection -- 8 A Huh? 9 Q In connection with other things, yes. 10 A Blockchain Technologies checks. There are 11 no Blockchain technologies checks? So show me them 12 and I'll tell you who did what. 13 Q In connection with the Synapse Foundation? 14 A If it's around the time of this bill, maybe 15 I'll remember it to recollect, to help me with my 16 memory. I mean, you're asking me things. I do a lot 17 of things all day, different things. So it's, you 18 know -- I'm not a -- I'm not sitting there standing 19 over one project. 20 I've got hundreds of projects. Mr. 21 Herskowitz over here probably wants a piece of all of 22 them after he gave me \$105,000 instead of \$250,000. 23 And he probably wants my dead father's gas station 24 too. I run that also. Maybe he wants that. 25 Q Now that you made your point, are you ready</p>	<p style="text-align: right;">Page 124</p> <p>1 N. SPANOS 2 hundreds of people in the blogosphere -- not 3 blogosphere. On the Internet who had some opinion of 4 what might should have happened. Designs and talks 5 and arguments, you know. It's like a PTA meeting 6 online. 7 Q And who -- 8 A Without titles. You know a PTA meeting? 9 The PTA meeting -- 10 MR. GINSBERG: Nick, just answer the 11 questions. 12 THE WITNESS: I'm sorry. I'm trying to 13 explain it. He's asking me to like give him some kind 14 of corporate structure. It doesn't work that way. 15 BY MR. HELLER: 16 Q Did you receive any compensation in 17 connection with this utility token generation 18 software? 19 A No. Wait a second. Wait a second. No. 20 Q Did any company that you're affiliated with 21 receive any compensation? 22 A Yes. 23 Q What company received compensation? 24 A Well, Blockchain Technologies. 25 Q Any other entity with which you're</p>
<p style="text-align: right;">Page 123</p> <p>1 N. SPANOS 2 to answer some questions? 3 A I don't even know what the question is. 4 Q Well, I will ask you. 5 A This same question? I don't know right now. 6 I would know if I had more documents to help me 7 recollect. I just don't -- it's not sparking right 8 now. I'm sorry. These are nuanced things. 9 I don't remember if it was a bounty. I 10 don't remember. I don't remember three years ago. 11 You're talking about three or four years. I don't 12 know. How many years ago was it? 13 Q In connection with the Synapse Foundation, 14 the ICO. 15 A I don't know. It's not an ICO. You know, 16 you keep saying ICO. It's not an ICO. 17 Q What was it? 18 A There was a token generation that occurred 19 which is a utility token which is software. So we 20 created software. You keep saying the word ICO. I 21 don't know that. And I'm trying to answer you because 22 I know you don't know that about the industry and 23 you're handicapped in that way. But -- 24 Q When you say we, who are you referring to? 25 A The everybody, the everybody. You know,</p>	<p style="text-align: right;">Page 125</p> <p>1 N. SPANOS 2 affiliated with? 3 A I don't think so. I don't remember. 4 Q Do you have any evidence of any payments 5 that were made to Blockchain Technologies -- 6 A Yeah. Right here. Right in front of me. 7 MR. GINSBERG: Let him finish the 8 question. 9 THE WITNESS: I'm sorry. 10 BY MR. HELLER: 11 Q -- in connection with the utility software. 12 And that's -- you pointed to Exhibit B. 13 A Yes. 14 Q Did you personally or any entity that you're 15 affiliated with receive any tokens in connection with 16 the utility software? 17 A Yes. 18 Q How many tokens did you -- 19 A I don't know. Do I have to answer that? 20 MR. GINSBERG: Let him finish the 21 question. 22 THE WITNESS: Keep going. 23 BY MR. HELLER: 24 Q How many tokens did you or an entity that 25 you're affiliated --</p>

<p style="text-align: right;">Page 126</p> <p>1 N. SPANOS 2 A Five million. 3 MR. GINSBERG: Nick, please give me 4 time. 5 THE WITNESS: Look, the guy wants an 6 answer. I'm trying to help him out. I'm sorry. 7 BY MR. HELLER: 8 Q And who received it? You personally or an 9 entity? 10 A I don't remember. It's not me personally. 11 Q If it -- 12 A And it -- huh? 13 Q If it was an entity, was it Blockchain 14 Technologies that received the 5 million tokens? 15 A Most likely I think if I remember, I don't 16 know. I don't remember. 17 Q I'd ask that a record be left in the record. 18 MR. GINSBERG: Excuse me? 19 MR. HELLER: A record be left in the 20 record as to which entity received the 5 million 21 tokens. 22 MR. GINSBERG: We've produced all of 23 the documents. Mr. Spanos doesn't have the -- doesn't 24 know the answer. I'm not sure what you're asking. 25 MR. HELLER: There's an entity that</p>	<p style="text-align: right;">Page 128</p> <p>1 N. SPANOS 2 You're asking a hypothetical. Mr. Spanos has just 3 testified that he didn't receive it and he doesn't 4 know which if any company did receive it. 5 MR. HELLER: He said someone did 6 receive it. I want to know who. 7 MR. GINSBERG: Do you know who received 8 it? 9 THE WITNESS: I don't remember. But I 10 think it was -- 11 MR. GINSBERG: I don't want you to 12 speculate. 13 THE WITNESS: Okay. 14 MR. GINSBERG: You either know or you 15 don't remember. 16 THE WITNESS: I don't remember. 17 BY MR. HELLER: 18 Q Was it Blockchain Technologies Corporation? 19 A Excuse me? 20 Q Was it Blockchain Technologies Corporation 21 that received the 5 million tokens? 22 A I don't remember. But I believe so. But I 23 don't remember. 24 Q Like I said, you can check your records to 25 determine whether or not Blockchain Technologies</p>
<p style="text-align: right;">Page 127</p> <p>1 N. SPANOS 2 received 5 million tokens. 3 THE WITNESS: Yeah. I believe -- 4 MR. GINSBERG: Stop it. 5 THE WITNESS: Oh, I'm sorry. 6 MR. HELLER: In connection with the 7 utility software that was created -- 8 MR. GINSBERG: Right. 9 MR. HELLER: -- for Synapse Foundation. 10 And Mr. Spanos testified that he didn't get it 11 personally and Blockchain Technologies Corp. did not 12 get the 5 million tokens. 13 THE WITNESS: I didn't say that. 14 MR. GINSBERG: No. He didn't say that. 15 He said he doesn't know. 16 THE WITNESS: I said I don't remember. 17 BY MR. HELLER: 18 Q Okay. Assuming you didn't get it personally 19 and Blockchain Technologies did not receive the 5 20 million tokens -- 21 MR. GINSBERG: Stop. 22 BY MR. HELLER: 23 Q -- what other entity would have received the 24 5 million tokens? 25 MR. GINSBERG: Objection as to form.</p>	<p style="text-align: right;">Page 129</p> <p>1 N. SPANOS 2 received the 5 million token. 3 MR. GINSBERG: I mean, we've already 4 checked the records. You've been -- you have been -- 5 MR. HELLER: And nothing has been 6 produced. 7 MR. GINSBERG: Excuse me. Whatever 8 exists has been produced. We'll make another effort 9 if we have not done that. But I believe we have 10 produced everything that exists. I'm not sure how 11 that relates to jurisdiction over the Zap.org in any 12 event. 13 MR. HELLER: It does. Payment for 14 services rendered. But that's -- 15 MR. GINSBERG: Excuse me? I can't 16 understand you. 17 MR. HELLER: Payment for services 18 rendered in New York if it was paid to Blockchain 19 Technologies Corporation. I think it may have a -- 20 MR. GINSBERG: That's not how you get 21 jurisdiction over -- 22 MR. HELLER: There are many aspects. 23 MR. GINSBERG: Excuse me. That's not 24 the law. That's not how you get jurisdiction. The 25 law is very specific as to the bases for jurisdiction</p>

<p style="text-align: right;">Page 130</p> <p>1 N. SPANOS 2 over an organization or an entity. And that's not one 3 of them.</p> <p>4 BY MR. HELLER:</p> <p>5 Q Mr. Spanos, did you have any meetings with 6 any attorneys in the city of New York in connection 7 with the formation of the Synapse Foundation?</p> <p>8 A No.</p> <p>9 Q Did you have any meetings with any attorneys 10 in New York in connection with the creation of 11 Zap.org?</p> <p>12 A That would be acting as attorneys?</p> <p>13 Q Did you have any meetings with any attorneys 14 in New York in connection with the formation of 15 Zap.org?</p> <p>16 A No.</p> <p>17 Q Did you have any meetings with any 18 individuals in New York in connection with the 19 formation of Zap.org?</p> <p>20 A No.</p> <p>21 Q Did you have --</p> <p>22 A Wait, wait, wait. What'd you say?</p> <p>23 Q In connection with the formation of Zap.org.</p> <p>24 A Any individuals?</p> <p>25 Q Any individuals in New York.</p>	<p style="text-align: right;">Page 132</p> <p>1 N. SPANOS 2 Q Did you have any meetings with Mr. 3 Herskowitz in New York?</p> <p>4 A Yes.</p> <p>5 MR. GINSBERG: Let him finish the 6 question.</p> <p>7 THE WITNESS: Oh, I'm sorry.</p> <p>8 BY MR. HELLER:</p> <p>9 Q -- in connection with an entity to be 10 formed in the Isle of Man?</p> <p>11 A Yes.</p> <p>12 Q When did you have those meetings, that 13 meeting?</p> <p>14 A Oh, I --</p> <p>15 MR. GINSBERG: Wait, wait, wait, wait, 16 wait. This is far afield from Zap.org. Unless -- I 17 mean, this has nothing to do with whether there was a 18 jurisdiction over Zap.org.</p> <p>19 THE WITNESS: Yeah. No. I can't -- 20 can I write something?</p> <p>21 MR. GINSBERG: No.</p> <p>22 BY MR. HELLER:</p> <p>23 Q What was discussed in that meeting with Mr. 24 Herskowitz?</p> <p>25 MR. GINSBERG: Objection, unless there</p>
<p style="text-align: right;">Page 131</p> <p>1 N. SPANOS 2 A Yeah. Zap.org is a website.</p> <p>3 Q Okay.</p> <p>4 A I corrected him.</p> <p>5 MR. GINSBERG: Just answer --</p> <p>6 THE WITNESS: Keep my mouth shut?</p> <p>7 MR. GINSBERG: Just answer the 8 question.</p> <p>9 THE WITNESS: I'm trying. But the guy 10 is like --</p> <p>11 MR. GINSBERG: Did you have any 12 meetings in New York with anyone regarding the 13 creation of Zap.org, yes or no?</p> <p>14 BY MR. HELLER:</p> <p>15 Q You don't create a website?</p> <p>16 A I'm just saying. Probably.</p> <p>17 MR. GINSBERG: No. Answer the question 18 about whether you had meetings in New York about the 19 formation of Zap.org.</p> <p>20 THE WITNESS: No.</p> <p>21 BY MR. HELLER:</p> <p>22 Q Did you have any meetings with any 23 individuals in New York regarding the formation of the 24 Synapse Foundation?</p> <p>25 A No. I don't think so.</p>	<p style="text-align: right;">Page 133</p> <p>1 N. SPANOS 2 was something relating to the presence of Zap.org in 3 New York.</p> <p>4 THE WITNESS: Well, Mr. Herskowitz -- 5 the meeting was Mr. Herskowitz was supposed to give me 6 \$250,000 and he didn't. He only gave \$105,000 many 7 years before. And he realized I think -- I don't know 8 if he realized. But I think he realized that he 9 screwed up by not giving me all of the \$250,000 those 10 many years before.</p> <p>11 So he befriended me and was walking 12 around with me, telling me he was going to help me. 13 But what he was doing was trying to take an inventory 14 of what I did in my life so he could try to attach 15 himself to it and try to sue me for it. And then he 16 found the errors of his way.</p> <p>17 So he wanted to get 200 -- he wanted to 18 supplement the \$250,000. He wanted to pay the rest of 19 it that he didn't pay years before. And I said it 20 doesn't work that way.</p> <p>21 And there was a meeting about the 22 formation of a company. But it had nothing to do with 23 Zap.org or the Synapse Foundation. It was something 24 else at that time.</p> <p>25 BY MR. HELLER:</p>

<p style="text-align: right;">Page 134</p> <p>1 N. SPANOS 2 Q Okay. 3 A To the best of my recollection. And because 4 of that meeting, because he didn't give me the money, 5 I didn't -- I'd been under the gun. Because he didn't 6 give me the rest of that money and put a UCC on my 7 stuff, on all these people's things and he told me I 8 can't give the shares out to anyone. And I had all 9 these people. I lost a lot of people. People went on 10 to do great things. But I couldn't bring them onboard 11 with mine because he inhibited my ability to do 12 business and a really -- you know, I should be on top 13 of the world. But instead I'm under Mr. Herskowitz's 14 thumb. That's where I'm at.</p> <p>15 BY MR. HELLER:</p> <p>16 Q Anything else to add?</p> <p>17 A Oh, I got a lot of things. I have --</p> <p>18 MR. GINSBERG: No, no, no.</p> <p>19 THE WITNESS: -- hundreds of ways -- 20 hundreds of places where I could have did something 21 and made something of myself with these things. But 22 this gentleman over here has really destroyed me.</p> <p>23 BY MR. HELLER:</p> <p>24 Q Okay.</p> <p>25 A I'm a simple person. I don't know about all</p>	<p style="text-align: right;">Page 136</p> <p>1 N. SPANOS 2 THE WITNESS: Just saying. All right. 3 I'm sorry. After you.</p> <p>4 BY MR. HELLER:</p> <p>5 Q Are you familiar with an individual by the 6 name of Nick Allen?</p> <p>7 MR. GINSBERG: I'm sorry. I can't 8 understand you.</p> <p>9 BY MR. HELLER:</p> <p>10 Q Individual by the name of Nick Allen.</p> <p>11 A I'm not sure if that's his name. But maybe.</p> <p>12 Q Who are you thinking of when you --</p> <p>13 A I don't know.</p> <p>14 Q Is there a Nick Allen who you know is 15 associated with the Synapse Foundation?</p> <p>16 A There's someone who said his name was Nick 17 Allen. I'm not sure if that's his name.</p> <p>18 Q Okay. Well, the individual that refers to 19 himself as Nick Allen, is that individual associated 20 with the Synapse Foundation?</p> <p>21 A The individual who has had referred to 22 himself as Nick Allen.</p> <p>23 Q So is he referring to himself -- is the 24 individual who refers to himself as Nick Allen who 25 says he's affiliated with the Synapse Foundation, is</p>
<p style="text-align: right;">Page 135</p> <p>1 N. SPANOS 2 this stuff. This is the first deposition I've ever 3 been in in my life. And I don't know what all this 4 stuff is. But I'm a victim. That was not Zap.org 5 back then and it wasn't Synapse Foundation back then. 6 It was another thing we were --</p> <p>7 MR. GINSBERG: There's no question 8 pending.</p> <p>9 THE WITNESS: Just saying. It was some 10 other organization name or something.</p> <p>11 MR. GINSBERG: There's nothing pending.</p> <p>12 THE WITNESS: And people stole the 13 names. It's crazy.</p> <p>14 BY MR. HELLER:</p> <p>15 Q I'm just going to see if I have a few more 16 questions and then we'll be done. I'm not sure if I 17 asked you --</p> <p>18 A I'm going to tutor some people later. And 19 I'm wondering if --</p> <p>20 MR. GINSBERG: Nick --</p> <p>21 THE WITNESS: -- I have to give a 22 percentage to Mr. Herskowitz.</p> <p>23 MR. GINSBERG: Nick, stop.</p> <p>24 MR. HELLER: Anything else?</p> <p>25 MR. GINSBERG: Stop.</p>	<p style="text-align: right;">Page 137</p> <p>1 N. SPANOS 2 he authorized to associate himself with the Synapse 3 Foundation?</p> <p>4 A No. I don't think so.</p> <p>5 MR. HELLER: Unless you have anything 6 else, I don't have anything else.</p> <p>7 MR. HERSKOWITZ: I'd like to talk a few 8 minutes.</p> <p>9 MR. HELLER: You want to give them 10 10 minutes?</p> <p>11 COURT REPORTER: Going off the record?</p> <p>12 MR. HELLER: Yes. Off the record.</p> <p>13 COURT REPORTER: Going off the record.</p> <p>14 The time now is 1:37 p.m.</p> <p>15 (Off the record.)</p> <p>16 COURT REPORTER: We're back on the 17 record. The time now is 1:43 p.m.</p> <p>18 BY MR. HELLER:</p> <p>19 Q Do you know of anyone who is promoting the 20 technology of Zap.org?</p> <p>21 A Yeah. A lot of people.</p> <p>22 Q Are you one of those individuals promoting 23 the technology of Zap.org?</p> <p>24 A Explaining the technology if someone asked 25 me. I mean, if you asked me right now, I'll explain</p>

<p style="text-align: right;">Page 138</p> <p>1 N. SPANOS 2 it to you. 3 Q Other than you, you say a lot of people. 4 Who's promoting the technology? 5 A Yeah. There's -- well, I don't know. 6 People who maybe have bought the software and want to 7 resell it for more money or want to explain it to 8 people. So there's media articles. There's stuff 9 going that hasn't -- there's no control over it, 10 centralized control. 11 Q So are there any specific individuals 12 authorized by the Synapse Foundation to promote the 13 software of Zap.org, to promote the technology? 14 A I'm not sure. At this moment? 15 Q At this moment. 16 A Yeah. I'm not sure. 17 Q Has there anyone, to your knowledge, been 18 engaged as far as being compensated to promote the 19 technology of Zap.org? 20 A In what timeline again? 21 Q From the time that the Synapse Foundation 22 was created to date. 23 A Okay. Yeah. 24 Q Who has been paid to promote the technology 25 of Zap.org?</p>	<p style="text-align: right;">Page 140</p> <p>1 N. SPANOS 2 Young given tokens as well? 3 A I think so. Yeah. 4 Q Do you recall -- 5 A I don't know how many. 6 Q Do you know what the reason was for Ben 7 Young getting tokens? 8 A Well, I don't know. Sometimes they give 9 tokens to get everyone on board, to get people on 10 board. So I'm not sure. This guy's been going all 11 day. 12 MR. GINSBERG: I don't want you to 13 guess. What? 14 THE WITNESS: So you've been having to 15 like write on that pad all day and I can't? 16 MR. GINSBERG: Mm-hmm. 17 THE WITNESS: That's ridiculous. 18 BY MR. HELLER: 19 Q Well, if you write on the pad, then I can 20 look at. So I don't think you want that. 21 A Oh, I don't care. What am I going to write? 22 The only thing I wrote -- 23 Q Do you know if Eric Dixon received tokens? 24 A Probably. 25 Q You know how much?</p>
<p style="text-align: right;">Page 139</p> <p>1 N. SPANOS 2 A Well, I'm not sure of every -- I'm not sure. 3 Q Well, who do you know? 4 A All right. So there's a guy doctor 5 something. Here's doctor. Charbovich or something. 6 Adrian. He's a last -- he's an Armenian. 7 Q Okay. 8 A I'm sorry. I always do that. 9 Theoretically, you know, depending on the bounty, if 10 there were bounties for stuff, whoever fulfilled the 11 requirements of the bounty. 12 Q Have you personally been paid to promote the 13 technology of Zap.org? 14 A Well, like I said, I got that 5 million Zap 15 sent to either this company which I believe -- I 16 believe -- I don't -- I'm not sure which -- but not me 17 personally. I think it went here. 18 Q But -- 19 A I've got to check the wallet. 20 Q But the 5 million tokens was for promoting 21 the technology of Zap.org? 22 A Whatever. Whatever. Whatever I can give to 23 the project, meaning whatever I can do for the project 24 that I'm allowed to do. 25 Q Was Ben Young or an entity owned by Ben</p>	<p style="text-align: right;">Page 141</p> <p>1 N. SPANOS 2 A I don't know. I'm not sure if he received 3 tokens or not. I don't know. I mean, I don't know if 4 I know. Yeah. I don't know. Was I privy to the 5 amounts? Maybe at one time. 6 Q Who would have records of the amount of 7 tokens that are given out to various individuals? 8 A It's on the wallets. It's on the computer. 9 You can look at it. It's all open source. 10 Q Okay. Is there anyone currently receiving 11 tokens for the promotion of Zap.org, the technology? 12 A I don't know. Probably. Maybe. There's 13 some bounties I think that are still floating around. 14 Q I have no further -- anyone hired to do 15 tradeshows to promote the technology of Zap.org to 16 your knowledge? 17 A No. 18 Q Do you know if anyone, to your knowledge, 19 has been hired to do events for Zap.org, to promote 20 the technology of Zap.org? 21 A Events? 22 Q Yeah. 23 A I don't think so. 24 Q Any PR companies hired? Who makes the 25 decision to hire individuals to promote the technology</p>

<p style="text-align: right;">Page 142</p> <p>1 N. SPANOS 2 of Zap.org? 3 A Listen, it's like who makes the decisions -- 4 say that again. 5 Q Who -- 6 A Yeah. 7 Q -- on behalf of the Synapse -- 8 A Okay. 9 Q The Synapse organization. 10 A Yeah. 11 Q The Synapse Foundation makes the decision as 12 to who on behalf of the Synapse Foundation promotes 13 the technology of Zap.org for pay? 14 A Well, it's all bountied out. So I don't 15 know, floating around. I don't think there's -- 16 there's -- I don't -- I don't know. I don't think so. 17 I don't think anyone's getting paid. 18 Q Okay. 19 A I'm not sure. But I don't think so. It's 20 all the community now. 21 Q Okay. I have no -- 22 A I believe. If someone's got a hundred 23 dollars' worth or something, you know, that's what 24 we're talking about here. 25 Q Mm-hmm.</p>	<p style="text-align: right;">Page 144</p> <p>1 N. SPANOS 2 MR. GINSBERG: I'll get back to you. 3 COURT REPORTER: Okay. You're getting 4 something or you're getting it from him? 5 MR. GINSBERG: I'll -- 6 MR. HELLER: Whatever we -- 7 MR. GINSBERG: I'll let you know. 8 MR. HELLER: We'll figure it out. 9 COURT REPORTER: Okay. We're going off 10 the record. The time now is 1:51 p.m. 11 (Signature Reserved.) 12 (Whereupon, at 1:51 p.m., the 13 proceeding was concluded.) 14 15 16 NIKOLAOS SPANOS 17 18 Subscribed and sworn to before me this 19 _____ day of _____, 2020. 20 21 22 23 NOTARY PUBLIC 24 25</p>
<p style="text-align: right;">Page 143</p> <p>1 N. SPANOS 2 A Because they wrote an article, they got \$50 3 worth of Zap tokens because it was bountied maybe if 4 the bounty's still laying there. I'm not sure. I'm 5 not sure. Personally I'm not sure. 6 Q Okay. 7 A Could I find out? I could probably find 8 out. But I don't know off the top of my head. 9 Q I only want to know what you know. 10 A That's what I know, not much. 11 Q No problem. 12 MR. GINSBERG: We'd like to sign and 13 read it. 14 MR. HELLER: Excuse me? 15 MR. GINSBERG: We'd like to read and 16 sign it, the transcript. 17 MR. HELLER: Yeah. Read and sign. 18 Well, if he's going to read it. 19 MR. GINSBERG: I'll read it to him. 20 THE WITNESS: I have a reader. 21 COURT REPORTER: Just the transcript 22 order, you have original plus two on the portal. Is 23 that what you'd like? 24 MR. HELLER: Yeah. 25 COURT REPORTER: And --</p>	<p style="text-align: right;">Page 145</p> <p>1 CERTIFICATE OF NOTARY PUBLIC 2 I, KENNETH KATZ, the officer before whom the 3 foregoing proceedings were taken, do hereby certify that 4 any witness(es) in the foregoing proceedings, prior to 5 testifying, were duly sworn; that the proceedings were 6 recorded by me and thereafter reduced to typewriting by a 7 qualified transcriptionist; that said digital audio 8 recording of said proceedings are a true and accurate 9 record to the best of my knowledge, skills, and ability; 10 that I am neither counsel for, related to, nor employed by 11 any of the parties to the action in which this was taken; 12 and, further, that I am not a relative or employee of any 13 counsel or attorney employed by the parties hereto, nor 14 financially or otherwise interested in the outcome of this 15 action. 16 17  18 19 KENNETH KATZ 20 Notary Public in and for the 21 State of New York 22 23 [X] Review of the transcript was requested. 24 25</p>

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2 I, BENJAMIN GRAHAM, do hereby certify that this
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5 and accurate record of the proceedings to the best of my
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8 action in which this was taken; and, further, that I am not
9 a relative or employee of any counsel or attorney employed
10 by the parties hereto, nor financially or otherwise
11 interested in the outcome of this action.

12

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14



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16

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[& - advisement]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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